



Fourth Program Year Action Plan

The CPMP Fourth Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

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Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan as well as an evaluation of past performance, a summary of the citizen participation and consultation process (including efforts to broaden public participation) (24 CFR 91.200 (b)), a summary of comments or views, and a summary of comments or views not accepted and the reasons therefore (24 CFR 91.105 (b)(5)).

Program Year 4 Action Plan Executive Summary:

Executive Summary Response: Include the objectives and outcomes identified in the plan

The general local consensus as revealed at various points in the continuing process of consultation is centered on constant themes:

1. The need for a greater supply of affordable ownership and rental housing units
2. While much has been done to increase the number of emergency shelter, supportive/transitional and ultimately permanent units for homeless individuals and families as well for special needs populations, substantial need remains among the lower-income population in Brockton - even as Brockton's ten year plan to end homelessness (April 2, 2008) and multi-party efforts continue seeking to reach established goals.
3. Supportive social service needs remain high as Brockton's wide network of nonprofit agencies works hard to meet them.
4. The revitalization and stabilization of targeted low and moderate income neighborhoods remains a high priority
5. Modernization of aging infrastructure to support neighborhood stabilization and preservation is a constant need
6. Economic development efforts through several initiatives remains of significant importance to the City of Brockton, not only as a means to create jobs and reduce unemployment but also because it is essential if Brockton is to broaden the tax base and lower the tax burden on working persons and families.

The CDBG funds which are expected to be \$1,656,407 for the next year, are managed by the Brockton Redevelopment Authority [BRA]. All of the census tracts in Brockton in 2000 were more than 50% low and moderate income. Thus the BRA has chosen to distribute funds based solely on needs that have been prioritized by the City. There is no geographically based allocation.

The HOME funds are expected to be \$850,000 for the next year and are managed by the Brockton Housing Authority [BHA]. The BHA has chosen to distribute funds based solely on needs that have been prioritized by the City.

The objectives that the City has established for the fourth year (2011-2012) of the five year plan are as follows:

First Objective – Preservation

The priority is to preserve what affordable housing there is, whether it is already subsidized by the government with expiring use restrictions, or whether it is unrestricted private market units occupied by and affordable to households with low incomes.

Strategies: The strategies to be used are:

- Maintain, support and preserve the existing housing stock;
- Prevent housing deterioration and vacancies;
- Prevent neighborhood deterioration due to foreclosures and vacancies through a variety of means including counseling.

Funded Projects:

1. Self Help, Inc. – Lead Abatement Program

The City of Brockton has been awarded \$2,100,000 from HUD's Lead Based Paint Hazard Control program to produce 125 units of lead safe housing to residents of Brockton. The city of Brockton will contract with Self Help Inc. to implement this program. In addition, the City of Brockton, through Community Development Block Grant funding has provided funding of \$50,000 in matching funds that will be available to assist 20 Brockton property owners with their share of abatement costs.

CDBG \$50,000

2. Homeowner Housing Rehab

The Brockton Redevelopment Authority will provide funding in the form of deferred payment loans to qualified low and moderate income property owners in the City of Brockton. The funds will be expended according to the scope of work to be completed and will not exceed \$30,000. For single family applicants, this will be an interest free loan for qualified applicants who meet income guidelines established by the U.S. Dept. of Housing and Urban Development. A lien will be placed on the property. Should the owner sell, refinance or transfer the property, the total amount of the loan must be repaid at 0% interest. No

properties with more than 2 units will be considered. At least 51% of the total units must be occupied by low and moderate income households.

CDBG \$342,270

3. NHS of the South Shore – First Time Homebuyer and Personal Financial Education Program

In an effort to deal with the causes and effects of the foreclosure crisis in Brockton, the BRA will partner with NHS to provide housing services to help stave off foreclosure and prevent displacement of tenants as well as homeowners. There are programs. One will support the foreclosure counseling services to Brockton residents. This program will allow the Brockton NeighborWorks Homeownership Center to offer Homebuyer Education Workshops. It is estimated that the program will educate over 350 potential homebuyers to become educated and successful homeowners. The second program is to provide Foreclosure Counseling services to residents who are at risk of losing their homes. Some will go through foreclosure, shortsale or deed-in-lieu. Others may save their homes by working with lenders through modification, repayment plan or forbearance. NHS intends to bring the most positive outcome possible for each client and help secure their financial future through education.

CDBG \$40,000

4. Self Help, Inc. – Landlord Training Program

Funding is to be used to conduct a Landlord Education Course to educate low and moderate income landlords and landlords to be of multi-family properties as to their duties and rights with respect to tenants. Training will focus on budgeting, maintenance, requirements of sanitary codes and the provisions of fair housing laws. The main objectives of the program are to educate landlords, reduce the number of vacant and abandoned property, provide successful home ownership and rentals to low and moderate income families and provide a healthy home environment. CDBG funds will be used to provide partial salaries to the program, consumables required for class attendees, contract with sub-grantees and continued program certification.

CDBG \$15,000

Second Objective – Production

This priority is to produce affordably restricted housing units that will be available to low income families for a period of time that meets or exceeds the required affordability periods based on the amount of investment in the properties.

Strategies: The strategies to be used are:

- Increase the overall availability of affordable permanent housing through the creation of new units and the return to habitable status of vacant/deteriorated units.
- Preserve the quality of life in existing neighborhoods while accommodating smart growth; support a well-conceived balance between housing development, transportation, open space and recreational

- facilities and appropriate commercial development opportunities.
- Housing Rehab loan programs that place affordable restrictions on rental units in owner-occupied multi-family properties throughout the City.
- Support organizations using NSP funds for foreclosed properties.

Funded Projects:

1. New Construction: Brockton Housing Authority

The Brockton Housing Authority (BHA) will utilize HOME funds to construct a duplex located at Plot 48-2 Tribou Street, as additional affordable housing opportunities in Brockton. BHA will acquire the property from the City of Brockton and construct the duplex with HOME funds and private financing and rent the apartments to low income tenants.

HOME \$176,000

2. New Construction: Station Lofts

Capstone Communities LLC will utilize HOME funds to redevelop the Knight Building located at 124 Montello Street into 25 units which will include 14 units of affordable and workforce as well as 11 market rate units. Capstone Communities plans on utilizing HOME funds from DHCD and Brockton, DHCD tax credits and CATNHP funding and federal and state historic tax credit equity. Station Lofts is located in the heart of Brockton's downtown and is located in the Downtown Brockton Smart Growth Overlay District (DBSGOD) Downtown Core Sub-District. The site is one block from the MBTA Commuter Rail Station.

HOME \$100,000

3. Rental Development – Acquisition & Rehabilitation

The Brockton Housing Authority (BHA) will utilize HOME funds to supplement a commitment of \$2 Million in grants to the Brockton Housing Authority and Southeastern Massachusetts Affordable Housing Corporation (SMAHC) from the Massachusetts Department of Housing and Community Development (DHCD) and/or other financing sources to acquire and rehabilitate abandoned bank-owned, foreclosed two or three family buildings as additional affordable housing opportunities in Brockton.

HOME \$255,000

Third Objective – Increase access to homeownership for very low, low and moderate income households

Strategies: The strategies to be used are:

- Down Payment and Closing Cost Assistance to assist low and moderate income first time home buyers who are looking to enter the housing market and purchase their first homes.
- Support low and moderate income households who invest in older, more affordable housing stock in the jurisdiction through a purchase and rehab program.
- Housing counseling courses for low and moderate income households who are considering purchasing a property.

- Increase and expand current fair housing activities, including affirmative fair marketing, outreach efforts and translation of vital docs.

Funded Projects:

1. First Time Homebuyer Assistance

HOME funds to provide down payment assistance and reasonable closing costs for eligible low/moderate income home buyers citywide. Recapture provisions are required calling for repayment on an annual declining balance basis if the property is sold within varying time periods keyed to the amount of assistance received.

HOME \$55,000

2. Southeastern Massachusetts Affordable Housing Corporation (SMAHC) (CHDO)

Southeastern Massachusetts Affordable Housing Corporation (SMAHC), a private non-profit entity, acting as the local CHDO, will utilize HOME funds to acquire and rehabilitate single family homes and sell them to low/moderate income families as additional affordable housing opportunities in Brockton. SMAHC will use CHDO proceeds from the sale of the CHDO developed homeownership units for HOME-eligible or other housing activities to benefit low/moderate income families.

HOME: \$166,000

Fourth Objective - Stabilization and Improvement of "At Risk" Neighborhoods

The overall strategy is to maximize intervention which addresses activities and events which can cause neighborhoods undergoing disinvestment to prevent them from becoming more destabilized.

Strategies: The strategies to be used are:

- Support projects that stabilize foreclosed properties (or properties at risk of foreclosure) or low income households at risk because of loss of income and inability to service their mortgages or who are renting in properties at risk of foreclosure.
- Provision of better fire protection for housing by means of more and more effective fire equipment.
- Provision of more flexible police programs to reduce crime.

Funded Projects:

1. Brockton Police Department – Mobile Anti Crime Unit

A specially equipped and trained unit focuses on preventing crime by creating a high visibility profile and rapid response in areas frequented by known criminals. CDBG funds will provide partial funding to continue this mobile patrol. Four police officers make up two patrol cars assigned to census tracts 5104, 5108, 5109 and 5114.

CDBG: \$155,000

2. Brockton Fire Department

The Brockton Fire Department intends to purchase a new 1,500 gallon per minute pumping engine. This equipment would be located at Station 1 (42 Pleasant Street, census tract 5109) or Station 2 (945 Main Street, census tract 5116). This equipment is necessary to meet the emergency service needs of all residents of Brockton.

CDBG: \$450,000

Fifth Objective - Economic Development

The priority is to support activities which will enhance the income of low and moderate income residents and provide jobs for those who are unemployed.

Strategies: The strategies to be used are:

- Develop neighborhood business in low mod areas which will employ low and moderate income residents and enhance businesses owned by low and moderate income residents
- Encourage the redevelopment of underutilized buildings and areas of the city especially downtown.
- Support business and encourage efforts which will help ensure that jobs are retained and created.
- Improve parking and traffic patterns throughout the downtown core and business districts.
- Attract people to the downtown core with improved retail and commercial uses, emphasizing investments such as façade improvements.

Funded Projects:

1. Section 108 Programs for Downtown Development

This is the first repayment of the Section 108 loan of \$2,600,000 awarded by HUD for the rehab of the Adams Street Garage; BRA's economic development loans to Brockton businesses; the "Acquisition/Rehabilitation and Receivership" programs. Both of the housing programs (AR&R) programs will continue to aid the City in addressing distressed vacant and abandoned properties.

CDBG: \$200,000

2. Arts in the Windows

This program is intended as a means of attracting people and businesses to the central business district of the city and to generally improve the quality of life and create a more suitable living environment for the residents of this predominately low and moderate income area. Funds will be used to pay the salary of a program coordinator and for a limited level of supplies to be used by the artists in their original creations. The project is regarded as high priority for Brockton in terms of altering negative perceptions of the Main Street corridor.

CDBG: \$25,000

Sixth Objective – Homeless and At-Risk of Homelessness Services

The priority is to intervene in situations which can lead to homelessness such as foreclosures and to develop permanent housing in place of temporary shelter for homeless families.

Strategies: The strategies to be used are:

- Information and referral services which will connect people at risk of homelessness with appropriate resources.
- Provision of training and other services to enable homeless people to become self-sufficient.

Funded Projects:

1. BAMSI (Brockton Area Multi Services Inc.) Helpline

Helpline is a program operated by Brockton Area Multi Services Inc., the local anti poverty umbrella organization serving the City of Brockton and surrounding areas. Helpline is an informational and referral resource that has for the past several years helped thousands of Brockton residents to locate services and assistance for a variety of needs. CDBG funds will be used to fund one (1) part time position for the Homeless Prevention Program that will assist low income households who are facing severe financial hardship which may jeopardize their housing.

CDBG: \$4,285

2. Father Bill's and Mainspring – Work Express Program

The Work Express program is designed to provide homeless persons with an opportunity to become productive citizens of the community through employment and independence by means of transitional housing, intensive case management, substance abuse counseling and basic skills development with a primary objective of helping unemployed homeless individuals reenter the workforce. Community Development Block Grant funds will be used to pay the salary of program employees and to supplement stipends paid to the program participants.

CDBG: \$8,461

3. Old Colony YMCA – Jon David Louison Family Center

The Old Colony YMCA provides two programs for families experiencing homelessness. The David Jon Louison Center serves 19 families (approximately 19 woman and 47 children) This program provide emergency shelter and housing, case management and support services to families in order to reach a higher level of self sufficiency.

CDBG: \$4,285

Seventh Objective – Special Needs Housing

The overall focus is on those populations which have special needs which are rarely served by the private market.

Strategies: The strategies to be used are:

- Develop services for special needs populations which have been growing in scope and size
- Support housing programs which serve special needs populations.
- Provide limited funding to special needs population for adaptive rehabilitation to owner occupied single and two family properties.

Funded Projects:

1. Health Imperatives

Health Imperatives – Penelope’s Place, a program of Health Imperatives, is one of the only Domestic Violence Shelters in all of Plymouth County. This organization has provided services to victims of domestic violence, including children, for over 25 years. During 2010, Penelope’s Place served 31 women and 29 children. The need for these services is evidenced by the fact that during all of last year, there were only 25 days in which the organization was not at full capacity. Funding for this project will provide six separate components including salary for a part time Life Skills Coordinator. Program materials, transportation costs, personal hygiene and self care items as well as appropriate attire for job searches are all part of the program.

CDBG: \$4,285

2. Family and Community Resources Inc.

Family and Community Resources, Inc. services victims of domestic violence and their children who are residents of Brockton Housing Authority developments, or receive Section 8 vouchers through the Brockton Housing Authority and funding to expand services to homeless victims and their children living in hotels within the City of Brockton.

CDBG: \$4,285

3. BAMSI (Brockton Area Multi Services Inc.) Dorn Davies Senior Center

Located in the Campello High Rise complex with three other strategically located buildings in the city, the Dorn Davies Senior Center provides a variety of programs and services that serve the needs of senior citizens in Brockton. These services include but are not limited to Health welfare, social programs, educational programs, counseling services, support groups and a nutritional program that provides groceries to elderly low and moderate income senior citizens.

CDBG: \$4,285

Eighth Objective – Supportive Services

Several segments of the low and moderate income population are in need of supportive services if they are to remain in good health and preserve their independence.

Strategies: The strategies to be used are:

- Provide a supportive learning environment for children which will enable them to be successful at school
- Improve peoples' lives by focusing on enabling independence using social service agencies.

Funded Projects:

1. Old Colony YMCA - Cosgrove Pool

CDBG funds will be used to provide salaries and related expenses in connection with the provision of structured recreational and instructional programs at the Old Colony YMCA Cosgrove Pool.

CDBG: \$55,000

2. Old Colony YMCA – Camp Massasoit

Camp Massasoit will enable children from low and moderate income families to participate in a summer enrichment camp program. Camp participation will offer a safe and enriching experience that assists in developing the camper physically, emotionally, mentally and spiritually while in a healthy outdoor environment. CDBG funds will be used to provide transportation to and from the camp.

CDBG: \$4,285

4. Associaco Cabo Verdean de Brockton – Youth Enhancement Program

The Association is requesting CDBG funding to support partial salary of a full time Coordinator for its Youth Enhancement Program (YEP). The coordinator provides assistance in the Cape Verdean de Brockton's continued efforts to outreach and assist youth in the City of Brockton. The Youth Coordinator is responsible for overseeing the youth programs and community outreach as well as conducting training sessions for mentors/volunteers. This after school program is a responsive, goal oriented community project aimed at an environment of cultural sensitivity and linguistic compatibility.

CDBG: \$4,285

Ninth Objective – Fair Housing

The Analysis of Impediments to Fair Housing contains several recommendations. Some of these can be addressed through the CDBG and HOME programs, while others require the actions of other agencies and organizations.

As a result of the City of Brockton's Analysis of Impediments to Fair Housing Choice, the Mayor appointed a task force to analyze and recommend strategies to implement the recommendations contained in the Analysis. This Task Force

is being chaired by Robert Jenkins, Director of Housing, Brockton Redevelopment Authority and its members are; Richard Sergi, Executive Director, Brockton Housing Authority, Thomas Washington, Director of Community Relations, Father Bills MainSpring, Kaitlin Leach, Assistant City Solicitor, City of Brockton. The Task Force has met regularly to discuss the issues raised in the Analysis and is continuing to meet in order to finalize its recommendations to the Mayor.

(1) Limited supply of affordable housing

Brockton's limited supply of affordable housing is one of the community's most significant barriers to fair housing choice. Lower income households experience a higher rate of housing problems than other households in Brockton, and this impacts minority households and people with disabilities in the community disparately because they are more likely to be low income households.

Recommendations:

#1: Continue to work with local and regional nonprofits and others to pursue opportunities to develop new affordable housing. Networks like the Massachusetts Smart Growth Alliance can provide resources and organizing support to promote equitable growth, including increased housing opportunities.

Actions Taken Year 3: The City of Brockton funded the Southeastern Massachusetts Affordable Housing Corporation with HOME and NSP funds to acquire and rehabilitate vacant foreclosed housing to create affordable housing units. The City is also funding the Brockton Housing Authority and the Old Colony YMCA on a Youthbuild housing project to create affordable housing units. The City has allocated HOME funds for Affordable Home Ownership down payment assistance with Neighborhood Housing Services of the South Shore. The City also is accepting applications for 40R zoning.

Actions Planned for Year 4: The City of Brockton plans to continue development of affordable housing as outlined in this Plan's Second Objective – Production

a. New Construction: Brockton Housing Authority

The Brockton Housing Authority (BHA) will utilize HOME funds to construct a duplex located at Plot 48-2 Tribou Street, as additional affordable housing opportunities in Brockton. BHA will acquire the property from the City of Brockton and construct the duplex with HOME funds and private financing and rent the apartments to low income tenants.

b. Rental Development – Acquisition & Rehabilitation

The Brockton Housing Authority (BHA) will utilize HOME funds to supplement a commitment of \$2 Million in grants to the Brockton Housing Authority and Southeastern Massachusetts Affordable Housing Corporation (SMAHC) from the Massachusetts Department of Housing and Community

Development (DHCD) and/or other financing sources to acquire and rehabilitate abandoned bank-owned, foreclosed two or three family buildings as additional affordable housing opportunities in Brockton.

And this Plan's Third Objective – Increase access to homeownership for very low, low and moderate income households:

c. First Time Homebuyer Assistance

HOME funds to provide down payment assistance, and reasonable closing costs for eligible low/moderate income home buyers citywide. Recapture provisions are required calling for repayment on an annual declining balance basis if the property is sold within varying time periods keyed to the amount of assistance received.

d. Southeastern Massachusetts Affordable Housing Corporation (SMAHC) (CHDO)

Southeastern Massachusetts Affordable Housing Corporation (SMAHC), a private non-profit entity, acting as the local CDHO, will utilize HOME funds to acquire and rehabilitate single family homes and sell them to low/moderate income families as additional affordable housing opportunities in Brockton. SMAHC will use CHDO proceeds from the sale of the CHDO developed homeownership units for HOME-eligible or other housing activities to benefit low/moderate income families.

#2 Continue to use HOME, CDBG and NSP funds, and other funds as available, to develop affordable housing, and affordable housing that is adaptable or accessible to people with mobility impairments.

Actions Taken Year 3: The City of Brockton funded the Southeastern Massachusetts Affordable Housing Corporation with HOME, CDBG and NSP funds to acquire and rehabilitate vacant foreclosed housing to create affordable housing units. The City is also funding the Brockton Housing Authority and the Old Colony YMCA on a Youthbuild housing project to create affordable housing units. The City has allocated HOME funds for Affordable Home Ownership down payment assistance with Neighborhood Housing Services of the South Shore.

Actions Planned for Year 4: The City of Brockton plans to continue development of affordable housing as outlined in this Plan.

#3 Track demographic information about applicants for and residents of subsidized and assisted housing to ensure programs are increasing housing choice as intended.

Actions Taken Year 3: All sub recipients of federal funding (CDBG) are required to provide quarterly reports that include the following demographic information (ethnicity, race, income, and family composition) regarding clientele and residents who benefit from the program.

Actions Planned for Year 4: Through workshops, training and program participation we will promote and require that demographic information be compulsory. We will also include all protected classes (race, sex, family status, religion, disability, national origin, as well as marital status and ancestry.)

#4 Create incentives for affordable development in the city's neighborhoods with lower concentrations of low income residents and minorities.

Actions Taken Year 3: None

Actions Planned for Year 4: None

#5 Create affordable housing partnerships with adjacent communities with lower concentrations of low-income residents and minorities.

Actions Taken Year 3: The Brockton Housing Authority is contracted to operate and consult with the Abington and Stoughton Housing Authority Section 8 programs.

Actions Planned for Year 4: None at this time.

(2) Lending inequities

Data on loan application, approval and denial rates as well as loan pricing demonstrates disparate treatment for minority loan applicants, particularly for Black and Latino applicants, in Brockton.

Recommendations:

#1 Continue to monitor and assess HMDA data and Community Reinvestment Act lender evaluations.

Actions Taken Year 3: The City of Brockton and the Brockton Redevelopment Authority working in coordination with the Mayor's Task Force on Housing and Foreclosure prevention; Neighborhood Housing Services of the South Shore; Massachusetts Office of Consumer Affairs and Business Regulations (Division of Banking); and the Federal Reserve Bank of Boston monitored and reviewed local banking institutions operational practices in Brockton's low income neighborhoods. The City of Brockton has also worked with the Commonwealth of Massachusetts Office of Consumer Affairs and Business Regulations (Division of Banks) held workshops on Foreclosure Counseling and Mitigation Fairs at Massasoit Community College. With funding from CDBG Neighborhood Housing Services of the South Shore (NHS) provided foreclosure mitigation counseling and First Time Homebuyer classes at the Multi Cultural Banking Center located at 68 Legion Parkway, Brockton, MA.

Actions Planned for Year 4: The above mentioned organizations will

continue to monitor and review local banking institutions operational and lending practices in Brockton's neighborhoods.

#3 Work with financial institutions with a local presence to develop and implement more joint lending programs through partnerships with lenders and the City, Freddie Mac, Fannie Mae, MassHousing, Massachusetts Housing Partnership (MHP) and others to promote existing lending programs and create new programs.

Actions Taken Year 3:

The City of Brockton, The Brockton Redevelopment Authority and the Brockton Housing Authority are members of the Brockton Housing Partnership which is a collaboration of local lenders and Fannie Mae and Massachusetts Housing Partnership which is a collaboration of local financial institutions (Banks and Credit Unions). We have worked with this group to establish lending programs such as the "Buy Brockton" Mortgage Program. In partnership with Citizens Housing and Planning Association (CHAPA); National Community Stabilization Trust (NCST); Massachusetts Housing Partnership (MHP); and Massachusetts Housing Investment Corporation (MHIC) we have promoted and leveraged several lending programs (Soft Second loan program, developer line of credit for acquisitions and rehabilitation of foreclosed vacant and abandon properties).

Actions Planned for Year 4:

- a. Work with local lenders to ensure that information about affordable and fair mortgages is available to all residents in a variety of languages and formats. Specifically conduct outreach to households from protected classes.
- b. The City of Brockton plans to continue to support NHS with CDBG funding for first time homebuyer assistance and foreclosure mitigation counseling.

#4 Work with residents, especially lower income people, to improve their financial management skills and increase knowledge about the lending process and laws.

Actions Taken Year 3: The City of Brockton has worked with the Brockton Housing Partnership on its "Credit for Life Fair" which is a fair that provides financial education to High School Students in a fun and interesting manner. The City of Brockton has funded with CDBG funds the Neighborhood Housing Services of the South Shore to offer foreclosure mitigation counseling, homebuyer classes and its multi cultural banking center.

Actions Planned for Year 4:

- a. With CDBG funding, the City of Brockton will continue to fund NHS First Time

Homebuyer Classes and Foreclosure Counseling classes. Each course requires a financial/budgeting component. The City will also utilize CDBG funds to support a Landlord Training Program provided by Self Help, Inc. This course also has a financial management component for first time homebuyers of 2 to 4 family properties. The course is also available to owner occupied existing landlords who may find themselves in need of assistance managing rental units.

#5 Collaborate with others and contract for fair lending testing and pursue legal action against institutions found to be promoting discriminatory or predatory lending practices in Brockton. Both the Fair Housing Center of Greater Boston and the National Community Reinvestment Coalition (NCRC – www.ncrc.org) can be resources for the City in conducting this work.

Actions Taken Year 3: Mayor Balzotti has appointed a task force committee to provide short term and long term recommendations, and actions to Brockton's "Analysis of Impediments to Fair Housing Choice". The committee is in process of developing recommendations and actions that include the city coordinating its efforts and using the resources of the Fair Housing Center of Greater Boston, National Community Reinvestment Coalition and local organizations like Brockton Interfaith Community (BIC) and South Coastal Legal Services.

Actions Planned for Year 4: The Mayor's Task Force Committee on Analysis of Impediments will provide recommendations for fair lending testing in the City of Brockton.

(3) Limited fair housing resources and activity in Brockton

Throughout this process, it has been clear that additional education opportunities and avenues for enforcement are needed. During the informational meeting about the Analysis of Impediments to Fair Housing and throughout the one-on-one interviews, there were many questions about the specifics of the laws and their impacts on rental, sale and development of housing as well as homeownership lending. Additionally, an Analysis of Impediments to Fair Housing had not been conducted in Brockton since 2002.

Recommendations:

#1 The City should commit CDBG resources for fair housing activities on a regular basis – some recommended activities follow. These initiatives can be through collaborations with organizations like the Fair Housing Center of Greater Boston, which already has national/regional contracts to provide the services, and some would need to be subcontracted and paid for through CDBG or municipal other funds.

The activities that follow should be conducted jointly with the local Board of Realtors, property owners (including Brockton Housing Authority and other subsidized housing owners), banks and other lenders with a local presence, and

other nonprofit and for-profit real estate and finance organizations in Brockton and in the South Shore region. The City should utilize the fair housing expertise available through the Fair Housing Center of Greater Boston and/or legal services and MCAD-trained consultants.

#1a Fair Housing Commission: Form and staff a Fair Housing and Human Rights Commission to undertake and coordinate some of the activities discussed herein. (A sample ordinance is included in Appendix D.)

Actions Taken Year 3: The Mayor's Task Force on Fair Housing is analyzing strategies to implement this recommendation.

Actions Planned for Year 4: The Mayor's Task force will have a recommendation to the Mayor on the process for implementing this recommendation.

#1b Outreach: Conduct more outreach about fair housing and fair lending, especially to housing and service providers, residents from protected classes, small property owners, City staff, boards and commissions (especially with real estate, planning and zoning related functions) and the full range of real estate and lending professionals.

Actions Taken Year 3: The Mayor's Task force committee on AI will have a recommendation.

Actions Planned for Year 4: The Mayor's Task force will provide a recommendation. On Analysis of Impediments to Fair Housing Choice.

#1c Outreach and Education: Continue to work with and fund the work of local and regional nonprofits for outreach and housing counseling, especially for residents from protected classes.

Actions Taken Year 3: The Mayor's task force committee on AI is preparing a recommendation to the Mayor on the process for implementing this recommendation.

Actions Planned for Year 4: The Mayor's task force committee on AI will provide a recommendation to the Mayor of Brockton.

#1d Information and Outreach: Continue to expand the availability of housing and fair housing information and outreach materials in a variety of languages. Ensure that City staff and others have access to housing and fair housing information and publications to share with residents.

Actions Taken Year 3: Through this organization, the City will provide fair housing materials in the following languages: Spanish, Portuguese and French Creole. NHS, Self Help, Inc. and the Mayor's task force committee on AI will complete this recommendation.

Actions Planned for Year 4: The Mayor's task force committee on AI will have a recommendation on how to expand the city's outreach.

#1e Training: Conduct fair housing training through workshops and other public and professional education activities.

Actions Taken Year 3: The Mayor's taskforce committee is preparing a recommendation to the Mayor on the process for implementing the recommendation.

Actions Planned for Year 4: The Mayor's taskforce committee is preparing a recommendation to the Mayor on the process for implementing the recommendation.

#2 Training: *All City employees, board and commission members and elected officials who work with housing or housing related issues should be well versed in fair housing. This not only helps to avoid legal action against the City (as in the current zoning board case) but also aids in the implementation of City programs and policies. For example, Inspectional Services staff members may be well-positioned to assess whether property maintenance neglect disproportionately affects protected classes or whether owners are retaliating against tenants for contacting the City, HUD or MCAD. Furthermore, municipal obligations to affirmatively further fair housing can be useful tools to promote affordable housing development locally and regionally.*

The following activities could be conducted with other agencies primarily through national and state funding that the agencies have already secured:

#2a Case advocacy: *Partner with the Fair Housing Center of Greater Boston or legal services to establish complaint referral protocols for processing discrimination case inquiries in a timely manner. Train public, private and nonprofit advocates to recognize potential discriminatory behavior to trigger a referral for case investigation, including testing.*

Actions Taken Year 3: The Mayor's taskforce committee is preparing a recommendation to the Mayor on the process for implementing the recommendation

Actions Planned for Year 4: The Mayor's taskforce committee will present the recommendations to the Mayor.

#2b Testing: Partner with the Fair Housing Center of Greater Boston to conduct rental and sales discrimination testing in Brockton and its immediate suburbs, including testing for racial steering. Use evidence found to tailor education and outreach efforts to the particular needs of Brockton residents. Pursue complaints against actors found in violation of the law, in conjunction with service providers, the Department of Justice and/or the Massachusetts Attorney General's office.

Actions Taken Year 3: The Mayor's taskforce committee is preparing a

recommendation to the Mayor on the process for implementation of testing the recommendation

Actions Planned for Year 4: The Mayor's taskforce committee will present the recommendations to the Mayor and begin the process of testing the recommendations.

#2c The following activity is a critical part of demonstrating the City's ongoing commitment to affirmatively furthering fair housing, and should be funded through CDBG and HOME administrative funds according to HUD's guidance:

Evaluation: Conduct regular analysis of impediments to fair housing choice to ensure that new obstacles are uncovered and progress to overcome existing impediments continues.

Actions Taken Year 3: Establishment of the Mayor's task force committee on "Analysis of Impediments to Fair Housing Choice" to review and provide counsel on how to implement the recommendation stated in the document.

Actions Planned for Year 4: The Mayor's task force committee on AI is preparing recommendations to the Mayor on the process of implementing this recommendation.

Executive Summary Response: Evaluation of Past Performance

The City has completed 23 (HOME) and 2 (CDBG) housing units in the past year. The major accomplishments in the priority areas are as follows:

a) Preservation

The City has rehabbed 4 (HOME) owner occupied and 0 rental units in owner occupied multi-family properties with HOME and CDBG funds over the past year. It has also loaned funds to rehabilitate and improve privately owned apartment buildings. These loans to private developers (non-profits and for-profit developers) has preserved and improved 2 existing rental units (utilizing CDBG funds) as affordable in the City.

b) New construction and rehabilitation

Loans for projects to create new affordable rental and homeownership units have resulted in the creation of 6 (HOME) and 9 (NSP) additional restricted rental units being created and 0 restricted homeownership units in the last year.

c) Access to Homeownership

The City has assisted 4 (HOME) first time home buyers with down payment and closing cost assistance to purchase property in the jurisdiction.

d) Stabilization and Improvement of “at risk” neighborhoods

It has provided supplementary funding for several projects in neighborhoods targeted for revitalization efforts, leading to increased investment in the neighborhood.

Executive Summary Response: Summary of Citizen Participation and Consultation Process (including efforts to broaden public participation) (24 CFR 91.200 (b))

Groups with programs which use or could use resources outlined in the Consolidated Plan, were notified of the development of the plan and were invited to submit suggestions, ideas and requests for support.

In addition, various organizations active in housing and services were contacted for the development of the Plan. Public meetings and hearings were conducted for public input, after official notices were advertised in local community newspapers. In addition, several interviews were conducted with organizations, seeking more specific ideas and priorities. The input from these meetings and interviews was used to generate this Year 4 Action Plan, as well.

The advertised City public meetings for public input were conducted at the following locations:

City Hall, Brockton	January 19 th 2011
City Hall, Brockton	April 19 th 2011

At the meetings attendees were invited to submit data and comments by email.

The draft Plans were made available on April 11^h 2011 at City Hall, at the BHA offices, City libraries and the draft Plan was also available online at www.brocktonhousingauthority.com and www.brockton.ma.us and by written request during the 30 day public comment period.

The City of Brockton received oral testimony during the preparation of the Annual Action Plan. Input was received from seniors, community residents, public housing and public service agencies and beneficiaries.

Representatives from several public service agencies and City Departments attended, informing staff of the changing services needed and responding to questions about priorities for the CDBG and HOME programs.

To ensure inclusion by underserved populations, agencies and groups which serve housing and public service needs were invited to participate in the process to identify goals. Many of the organizations serving the low income population of the area specifically represent the underserved and thus were able to verify underserved needs as identified in the plan.

The City also invited proposals for specific uses of CDBG and HOME funds.

Executive Summary Response: A Summary of Comments or Views and a Summary of Comments or Views not Accepted and the Reasons therefore (24 CFR 91.105 (B)(5)).

After the draft was issued and advertised, comments could be submitted to the BRA and BHA offices, prior to the completion of the final Plan.

See Attachment A for comments and responses which will be completed after the public comment period.

General Questions

- 1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.*
- 2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.*
- 3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.*
- 4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.*

Program Year 4 Action Plan General Questions response:

- 1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.*

The City of Brockton is located in the southeastern section of Massachusetts, some 20 miles south of Boston and 30 miles northeast of Providence, RI. Brockton's more than 94,000 persons reside in a community of 21.6 square miles. The City of Brockton is roughly divided into four major sections, those east and west of the rail line and the Montello section to the north and the Campello section to the south. Within these are a number of distinct neighborhoods. The neighborhoods clustered around the downtown contain the oldest and densest residential development; they clearly evidence lack of maintenance, numerous foreclosed and vacant properties, disinvestment and higher rates of poverty and incidence of crime. These neighborhoods are referred to as:

- Pleasant/Prospect (sometimes called Walnut/Turner),
- the Edgar Playground area and
- Perkins Park.

Table 1: Poverty and Minority Concentration by Census Tract and Block (2000)

Census Tract	Poverty Rate	Minority Rate (including Hispanic)
Tract 25023-5101	4.40%	22.80%
Tract 25023-5102	12.00%	31.10%
Tract 25023-5103	22.20%	59.60%
Tract 25023-5104	23.70%	68.10%
Tract 25023-5105.01	9.50%	32.90%
Tract 25023-5105.02	12.80%	43.00%
Tract 25023-5105.03	15.20%	39.30%
Tract 25023-5106	5.20%	13.70%
Tract 25023-5107	6.90%	31.60%
Tract 25023-5108	23.60%	69.10%
Tract 25023-5109	42.40%	66.60%
Tract 25023-5110	27.40%	55.70%
Tract 25023-5111	5.80%	24.70%
Tract 25023-5112	14.80%	34.40%
Tract 25023-5113.01	9.40%	37.70%
Tract 25023-5113.02	12.40%	37.20%
Tract 25023-5114	24.40%	64.00%
Tract 25023-5115	19.80%	63.70%
Tract 25023-5116	16.60%	42.90%
Tract 25023-5117.01	4.20%	18.20%
Tract 25023-5117.02	5.70%	15.90%
Brockton, MA	14.50%	41.50%

Note: The threshold level for HUD in applying Site and Neighborhood Standards for proposed HUD investments, established (for Brockton) a 30% poverty rate and a 36.7% minority rate as thresholds which in principle prevent HUD funds investment which would add to the poverty or minority numbers in those census tracts. They are highlighted in Table 1.

In determining whether a specific geographic area meets HUD requirements for investment of CDBG funds in an area which will benefit low and moderate income persons, the CDBG rules require that more than 50% of the residents be low and moderate income. The following table, using 2000 census data list the tracts which meet HUD's criteria for geographic investment.

Table 2: HUD Defined Eligible Census Tracts and Blocks (2000)

Census Tract	Low-Mod %
Tract 25023-5109	98.19%
Tract 25023-5108	69.40%
Tract 25023-5105.02	68.43%
Tract 25023-5110	65.72%
Tract 25023-5103	64.69%
Tract 25023-5114	64.39%
Tract 25023-5112	64.12%
Tract 25023-5104	60.74%
Tract 25023-5116	59.58%
Tract 25023-5115	49.46%
Tract 25023-5105.03	47.77%
Tract 25023-5113.01	45.71%
Tract 25023-5105.01	44.05%
Tract 25023-5107	43.21%
Tract 25023-5113.02	42.62%
Tract 25023-5102	40.46%
Tract 25023-5117.02	37.58%
Tract 25023-5111	35.97%
Tract 25023-5117.01	35.45%
Tract 25023-5101	30.42%
Tract 25023-5106	25.33%
Brockton, MA	54.11%

The attached map [Attachment C] based upon 2000 Census data shows the population of Brockton is predominantly (55.5%) low and moderate-income. The attached map [Attachment D] indicates areas of minority concentration/distribution throughout the City of Brockton.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

The CDBG program has identified low-mod and target areas within the City. The City both uses and considers the area's benefit, deconcentration objectives and the foreclosure crisis as factors in choosing which programs to fund.

The following areas are beneficiary eligible areas and may be the focus of CDBG funds over the next year.

Census Tract 25023-5109: Downtown Core Neighborhoods. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5108: Highland, Newbury and Green Streets Neighborhoods. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5105.02: Montello Neighborhood This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5110: The Village. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5103: Montello Neighborhood This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5114: Campello Neighborhood. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5112: East Side Neighborhood This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5104: Pleasant Prospect Neighborhood. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5116: Campello Neighborhood. This census track had in 2000, over 98% low/mod income households.

The public facilities and improvement projects that will receive funding meet eligibility criteria by providing services that benefit low and moderate-income persons living in the area.

As noted already, the City uses its programs and gives consideration to projects which are in high poverty or minority concentration areas which have disproportionate needs, or which target very and extremely low income households or individuals with disabilities, in order to better meet underserved needs. Last year

approximately 67% of CDBG funds were allocated as area benefit, thus benefiting low income households living in those eligible areas. For the coming year we anticipate allocating 77% to eligible areas and another 3% will be used primarily in those areas, even though not allocated geographically.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

The primary obstacle to meeting the underserved housing needs of low-income and moderate-income populations continues to be the availability of funds. Except for special populations unable to work (some elderly, most extra elderly, some disabled and those institutionalized), the critical need is jobs. When working with agencies to develop this plan, many agencies noted that a shift in clients had occurred. Previously many of the clients had no employment or sporadic employment histories. Now, individuals, who previously were fully employed are seeking help.

Organizations serving these populations continue to experience significant reductions in funding from both governmental and private sources. Reductions in state aid to local budgets have increased the funding shortfall, leaving many worthy and valuable programs unfunded or underfunded.

While this may be beyond City capacity of the local jurisdiction to address satisfactorily, the City is committed to continuing to work with and support public non-profit agencies such as the Brockton Housing Authority, elder service organizations, homeless providers and other special needs providers in their mission to meet the needs of the underserved population of the area. The City will continue to communicate with these groups as their needs change and/or the demand dramatically increases over the next year. Wherever possible, the City will provide technical assistance and support to providers in their pursuit of federal, state and other funding sources.

Moreover, the City actively educates organizations and citizens about ways to remove barriers to the development of affordable housing and promotes proven programs. It will continue these efforts in the future.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Brockton anticipates the following sources of funds for the year 2011-2012:

Table 3: CDBG, HOME and Other Leveraged Resources 2011-2012

Funds	Federal							State		Local		Total Revenue
Activity	CDBG	CDBG Program	HOME	HOME Program Income	McKinney Vento [CofC] (Est)	Federal Funding for BHA	Other Federal Funds	State Funding of BHA	Other State Funds	Private Funding	City of Brockton Funds	
Housing Programs	\$401,670	\$50,600	\$747,000	\$5,000			\$6,563,259		\$4,035,704	\$1,910,334		\$13,713,567
Public Services	\$248,456	\$-	\$-									\$248,456
Facility Improvements	\$650,000	\$-	\$-									\$650,000
Economic Development	\$25,000	\$-	\$-									\$25,000
Administration	\$331,281	\$11,400	\$83,000									\$425,681
Homeless Programs					\$672,283							
Public and Voucher Housing						\$17,492,015		\$6,621,048				\$24,113,063
Total Funds	\$1,656,407	\$62,000	\$830,000	\$5,000	\$672,283	\$17,492,015	\$6,563,259	\$6,621,048	\$4,035,704	\$1,910,334	\$-	\$39,848,050

Managing the Process

- 1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.*
- 2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.*
- 3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.*

Program Year 4 Action Plan Managing the Process response:

The City of Brockton, acting by and through its Mayor, Linda M. Balzotti, is entering into a sub-recipient agreement with the Brockton Redevelopment Authority (BRA) to carry out its Community Development Block Grant program (CDBG) and administer its Fiscal Year 2011 entitlement funds for that program, under HUD grant MC-25-0003; any other funds awarded the City of Brockton in conjunction with the scope of Annual Plan, including NSP funds, shall be deemed to be part of the Annual Plan and administered by BRA accordingly.

Also, the City of Brockton is again entering into a sub-recipient agreement with the Brockton Housing Authority (BHA) to carry out its Home Investment Partnership Program (HOME) and administer its Fiscal Year 2011 entitlement funds under HUD grant MC-25-0201.

- 1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.*

The City of Brockton's designated lead agency with respect to the Community Development Block Grant program (CDBG) is the BRA. With respect to the Home Investment Partnership Program (HOME), the lead agency shall continue to be the Brockton Housing Authority (BHA). It is the BRA's and BHA's responsibility to, under direction of the Mayor, prepare, submit and administer the City of Brockton's FY2008-FY2012 Strategic Plan and FY2011 Annual Plan. As the BRA and the BHA partner with other public agencies and with community based and/or private organizations in order to carry out projects and programs covered by the Strategic Plan and this Annual Plan, the BRA and BHA respectively shall be the agencies ultimately responsible for administering those programs. In developing new housing units with HOME funds, the BHA will work closely with SMAHC. In seeking to acquire (rescue) foreclosed homes, rehabilitate them as needed and sell them to First Time Buyers or rent them to lower income persons and families, the BRA will work in close cooperation with the Brockton Housing Partnership, Self Help, Inc. and other entities. In terms of public facilities, the BRA will work closely with

appropriate City Departments. The BRA will continue to work closely with Brockton 21st Century Corporation to carry out the Façade Improvements program and other local business financing assistance efforts intended to create or retain jobs in Brockton. The BRA will of course rely on the respective agencies and organizations to carry out the programs for which they received funding support in accordance with the representations they made in their sub-recipient grant applications.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

In addition to the publicly advertised Citizen Participation process, the BRA and BHA have sought out and encouraged input and involvement of public agencies, the business community, community-based organizations and other groups in the determination of community development and neighborhood needs and in recommending community development objectives, priorities and resource allocations. The significant aspects of the process employed to develop the Strategic Plan included: an in-depth review of data, annual reports, newsletters, special reports and plans having regional and local significance; seeking public input at advertised public hearings and inviting written comments; participation in forums on housing and social service issues; collegial participation in collaborative groups focused on housing and social issues; outreach to public instrumentalities involved in housing, public works and public services, planning and community/economic development; and one-on-one outreach via personal and telephone interviews to a wide range of public and private community based organizations similarly involved in activities and reflecting CDBG and HOME goals. The following entities were the focus of the information and input gathering effort:

Attended Public Hearing, January 19th 2011

Brockton Housing Authority
Brockton Redevelopment Authority
Brockton Fire Department
Brockton Interfaith Community
Brockton Area Multi Services, Inc.
Gregory Enos, Citizen of Brockton
Harbor One Credit Union
Health Imperatives
Neighborhood Housing Services of the South Shore
Old Colony YMCA
Self Help, Inc.

Provided Input via Personal Meeting, Telephone or Email Communications

Brockton Mayor's Office
Department of Mental Health – Brockton Office
Father Bill's and Mainspring House
Family and Community Services Inc.

Old Colony YMCA
Plymouth County Housing Alliance (Continuum of Care)
United Way of the South Shore

Submitted Applications for Funding

Associacio Cabo Verdiana de Brockton
Brockton Housing Authority
Brockton Fire Department
Brockton Police Department
Brockton Area Multi-Services Inc.
David Jon Louison Family Center (YMCA)
Dorn-Davies Senior Center (BAMSI)
Father Bill's and Mainspring House
Family and Community Services Inc.
Health Imperatives
Old Colony YMCA
Neighborhood Housing Services of the South Shore
Brockton 21st Century Corporation
Self Help, Inc.

Attended Public Hearing, April 19th 2011

To be added after public hearing

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health and social service agencies.

The City will continue to work closely with its non-profit partners to both monitor the success of existing programs and generate ideas for new programs to serve the changing needs of Brockton's low income population. BRA Staff will meet with subgrantees during the year to assess the existing program and discuss changes needed as well as ideas for new directions. The BRA Staff will also meet with non-profit and public housing providers to reassess needs and opportunities. The BRA and BHA regularly interacted with locally and regionally based agencies and community-based organizations seeking ideas and input as to the most pressing needs facing the City of Brockton, particularly its low- and moderate-income and minority populations. Again this year, the BRA and the BHA relied heavily on these consultations in developing this Annual Plan. The BRA and BHA encourage and maintain open lines of communication with all of these organizations and agencies. This has been the case in the development of the fourth year Annual Plan; it will be the case for the final and fifth annual plan.

Citizen Participation

- 1. Provide a summary of the citizen participation process.*
- 2. Provide a summary of citizen comments or views on the plan.*
- 3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.*
- 4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 4 Action Plan Citizen Participation response:

- 1. Provide a summary of the citizen participation process.*

The City of Brockton updated its Citizen Participation Plan (CPP) in March of 2008. The CPP encourages residents, particularly those of low and/or moderate-income and public service agencies, businesses, local and regional institutions, community and faith based organizations and City departments to participate in the creation of the Annual Plan and any amendments thereto, as well as in the preparation of its yearly CAPER (Consolidated Annual Performance and Evaluation Report). The CPP provides:

- that notice regarding access to information about program activities and funding and the opportunity to submit comments be made available in multiple languages reflective of the demographics of the city;
- that program activities will be structured so as to adhere to anti-displacement policies intended to minimize displacement and to provide assistance to any persons who may be displaced; for publishing the plan by means of summaries in newspaper(s) of general circulation, by making copies of plans, amendments and CAPERs available for inspection in various accessible public locations, and by posting the documents on the City's website, www.brockton.ma.us ;
- that at least two public hearings, to address needs, planned activities, program performance and public comments be held at times and places accessible to the public and with provisions for the participation of disabled and non-English speaking persons;
- that published and sufficient advance notice of hearings will be given to citizens, including residents of public and assisted housing;
- that citizens will be provided reasonable and timely access to meetings; that citizens will be provided at least 30 days to review and comment on the Strategic and Annual Plans and that the City will consider the views of citizens, public agencies and other interested parties in preparing the final submission;

- that in the case of any substantial amendment(s) – defined as the deletion or addition of an activity, source of income or objective in the Annual Plan – said amendment shall be publicly noticed and shall provide for a 30 day review and comment period before the amendment is implemented; that for all performance reports (CAPER) citizens will be provided reasonable notice and an opportunity to comment by means of an advertised 15 day comment period and provision that the City will consider any comments or views of citizens received in writing, as well as orally at public hearings;
- that the Strategic Plan, any substantial amendments, all Annual Plans and CAPERs shall be available to the public both in public buildings including BBB/BRA and BHA offices and on the City of Brockton website; and that upon request, technical assistance may include special interpretation and communication assistance will be provided to persons with disabilities;
- that the City of Brockton, through the BRA and BHA, will provide reasonable and timely access to records for citizens, public agencies and other interested parties with respect to the Strategic Plan, and all subsidiary documents and expenditures under the programs covered by the Plan throughout its five year term and/or the preceding five years;
- that technical assistance will be provided by BRA and BHA staff to all citizens, public agencies and other interested parties to provide in developing proposals for funding assistance under the Strategic Plan and that the BRA and BHA's own user-friendly "Application for Federal Community Development Block Grant Funds" and "Application for Federal HOME Investment Partnerships Program Funds" will be made available at its initial annual public hearing for a reasonable time thereafter at the BRA and BHA's offices;
- that with respect to the Strategic Plan, amendments and CAPER(s) the BRA and BHA will respond in a substantive manner within ten (10) business days to all complaints received in writing; and that in the case of the deletion or addition of an activity, source of income, or objective which will constitute a substantial change in use of funds programmed under any Annual Plan created under the Strategic Plan, citizens, agencies, and interested parties will be given reasonable notice of the proposed change and ample opportunity to comment on the proposed amendment.

2. Provide a summary of citizen comments or views on the plan.

Prior to the development of its FY2011 Annual Plan, the City advertised on January 4, 2011 in the Brockton Enterprise that a public hearing would be held to obtain the views of interested citizens, organizations, and parties as to the City's housing and community development needs. Notices were also posted in all Brockton Public Library branches, in City Hall and the BRA and BHA offices. Notices were translated into Cape Verdean, Spanish and Haitian and provided to nonprofit Agencies, churches, and schools for the general information of non-English speaking persons.

The advertised public hearing was convened on Wednesday January 19, 2011 at 7:00 p.m. in the GAR Room, City Hall, 45 School Street, Brockton.

A second public hearing was duly advertised in the Brockton Enterprise on April 19th 2011. Notices were again posted and provided to agencies and organizations.

At this hearing, the proposed FY2011 CDBG and HOME Annual Plan was outlined and past performance was reviewed.

On April 8th 2011 public notice was given that the draft FY2011 Annual Plan would be available in BRA offices and in the BHA offices, in City Hall, in City libraries and on the City's website www.brockton.ma.us and on the BHA website www.brocktonhousingauthority.com from April 11, 2011 to May 9, 2011 for public review and comment.

To be added after public comment period - As of May 10, 2011, ????? comments were received with respect to either the proposed Annual Plan or past program performance. The detailed comments will be listed in Attachment A

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

The BRA and BHA will employ translators as needed and notified for public hearings and meetings. For non-English speaking persons, the lead agencies would locate appropriate interpreter Assistance from nonprofit agencies or nearby college foreign language departments on an as needed basis. The BRA and BHA will seek assistance from various state and nonprofit agencies to provide communication assistance to hearing, speech or visually challenged persons as needed on a case by case basis. Public hearing notices will be posted on the City of Brockton website and citizens and interested parties will be invited to submit comments not only orally at formal public hearings, but also by means of written comments and emails during the comment period. The website will also offer a means to obtain translation and communication assistance as necessary for non-English speaking people and people with disabilities. As necessary, the BRA and BHA will seek help from the state Departments of Mental Health and Mental Retardation as well as the Massachusetts Rehabilitation Commission and private nonprofit agencies in cases involving people with mental and developmental persons.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

To be added after public comment period - In the development of the Annual Plan there were ?? comments received that were/were not accepted. There were ??? comments received during the identified and publicly noticed 30-day review period which ended May 9, 2011.

Institutional Structure

1. *Describe actions that will take place during the next year to develop institutional structure.*

Program Year 4 Action Plan Institutional Structure response:

1. *Describe actions that will take place during the next year to develop institutional structure.*

The Brockton Redevelopment Authority (BRA) and the Brockton Housing Authority (BHA) will carry out the FY2011 Annual Plan on behalf of the City of Brockton. The BRA and the BHA are accountable to the Mayor, as Chief Executive Officer of the City of Brockton. Day-to-day responsibility for administration of the CDBG and HOME programs and certain other grant funded activities will rest with the CDBG Director of the BRA and the Executive Director of the BHA respectively. The CDBG Director will also be responsible for energy policy coordination and long-term planning functions on behalf of the City. The BRA had the responsibility for preparing, submitting and implementing all previous Consolidated Community Development Plans and Action Plans as well as for managing the consultation and Citizen Participation processes, preparing annual CAPER(s) and interacting with HUD representatives. The BRA previously played a central and critical role in the planning, implementation and coordination of Brockton's multi-faceted and interrelated community and economic development efforts. As the BRA partners with other public agencies such as the Brockton Housing Authority and with community based and/or private organizations in order to carry out projects and programs covered by the Consolidated Plan, the BRA nonetheless will remain the agency ultimately responsible for administering those programs.

The Mayor has directed the BRA and BHA staffs in executing the FY2011 Annual Plan, to work closely and collaboratively with public and private housing agencies, principally the Brockton Housing Partnership as well as the Brockton 21stCentury Corporation, other municipal instrumentalities as directed, the Commonwealth's Department of Housing and Community Development and with several non-profit organizations working in the areas of affordable housing, homelessness, social services, and anti-poverty programs. The BRA and BHA will maintain solid working ties and relationships with the extended network of housing and social service providers operating in Brockton and within the region including the Old Colony Planning Council and the Plymouth County Housing Alliance. Lastly, the BRA and the BHA will remain active and engaged members and participants of the Mayor's Economic Advisors which acts as a focal point and clearinghouse for municipal entities, non-profit organizations and private industry interests pursuing a common economic development agenda.

Monitoring

1. *Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

Program Year 4 Action Plan Monitoring response:

1. *Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

The City of Brockton's accomplishments are reported in the HUD required Consolidated Annual Performance and Evaluation Report (CAPER) due on October 1. The CAPER is available for public comment and is advertised in local newspapers.

The City performs an ongoing monitoring process in compliance with HUD regulations. The purpose of the monitoring process is to evaluate performance with regard to: meeting goals and objectives; compliance with HUD rules, regulations and administrative requirements; timely use of funds; and prevention of fraud and abuse of funds.

Each year when the City accepts proposals for new CDBG and HOME funds, applicants are required to supply specific information on primary beneficiaries of the intended project, number of minority persons served, target population/s and service needs.

In particular, applicants are asked to disclose information regarding techniques used to identify, assess and reach target populations as well as commenting on the goals and objectives of the proposed project/s. Module forms are required along with invoices before payment. In later sections of the Plan there are performance objectives and indicators listed for each project. These are also in the CPMP *projects.xls* file.

Internal auditing of CDBG and HOME projects also provides a system for performance measurement. Project directors and sub-recipients are asked to relay information on anticipated goals of the project and identify actual measurable accomplishments including timeliness of expenditures. In the CPMP Projects workbook, specific measures of outcomes are listed to guide evaluation of project performance.

During the course of the fourth Annual Plan (July 1, 2011 to June 30, 2012), the BRA and BHA will perform within the HUD threshold for timely expenditure of funds, which is a gauge of the effectiveness of the City's administration of the CDBG and HOME Programs.

Implementation of all of the federally funded programs will of course comply with all federal laws and regulations and with relevant state laws and local ordinances; particular projects and activities will be coordinated as appropriate with City departments and other local agencies. The BRA and BHA will be responsible for

monitoring of sub-grantees to include compliance with the terms of the grant agreement. The BRA and BHA will be responsible for monitoring labor standards in applicable construction projects. The BRA and BHA will, utilizing staff familiar with HUD regulations, undertake specific monitoring steps for the various types of activities as described below:

Public Services [non-profits]:

- conduct periodic on-site monitoring; review on-site records and other pertinent information;
- require the nonprofit agencies to submit regular reports indicating the number of low- and moderate-income persons and the ethnicity of those serviced by the funded program/activities; such reports will be required to include particular detail as to how funded programs/activities are benefiting underserved very low-income persons.

Economic Development and Micro-Enterprise Assistance:

- maintain job creation/retention records for each business assisted
- periodic monitoring of wage rates
- maintain records and reports of micro-enterprises assisted including business maturation attributable in part to the assistance provided.

Rental Development/Homebuyer Assistance/CHDO:

- undertake careful review of income eligibility for grants/assistance by means of credible income verification;
- undertake outreach to minority members of the community so as to facilitate their access to these financing tools;
- include recapture provisions in all homebuyer assistance agreements with homeowners, calling for repayment if the property is sold within varying time periods keyed to the amount of assistance provided; recapture provisions are to be secured by liens;
- ensure long term code compliance in rental units; the BHA to conduct annual inspections of rental units constructed with HOME funds.

Public Facilities/Public Improvements:

- follow established HUD procedures and regulations pertaining to Davis-Bacon wages;
- HUD forms 11 and weekly payroll forms will be required on such projects;
- contract bid documents will stipulate participation by Minority Business Enterprises (MBE) and Women Business Enterprises (WBE) to the greatest extent possible.

Davis Bacon Compliance

In addition, the Agency oversees federally funded facility projects which require Davis Bacon compliance. The Agency agreements include all necessary information that must be included in a sub-recipient's contract for construction projects including:

- HUD Form 4010 – Federal Labor Standards Provisions
- U.S. Department of Labor Payroll forms
- the appropriate wage determination
- reference to the "Notice to All Employees" poster, to be posted at job site
- reference to the "Contractor's Guide to Prevailing Wage Requirements for Federally-Assisted Construction Projects", which is to be provided to the prime contractor

The Agency conduct site visits, conducts employee interviews and check the weekly payroll forms for accuracy and compliance.

Fair Housing Compliance

Residents and/or property owners with questions, issues or complaints associated with applicable Fair Housing laws and requirements may access the technical services of agencies such as the BHA and the BRA. The City is charged with ensuring that education about fair housing is conducted and to manage complaints which might be received. Also see the Impediments to Fair Housing report in the Executive Summary above.

Section 3 Compliance

The purpose of Section 3 of the Housing and Urban Development Act of 1968, is to provide economic and employment opportunities to low- and very-low income individuals to the "greatest extent feasible" and businesses that are majority owned by Section 3 residents or whose permanent, full-time employees are 30% Section 3 residents or are businesses that contract in excess of 25% of subcontracts to such Section 3 businesses. Recipients of HUD funds in excess of \$200,000 and individual contracts or subcontracts in excess of \$100,000 are subject to Section 3.

If the Agency issues a contract in excess of \$100,000 it will require a Section 3 plan from the contractor and will monitor that plan to ensure that businesses used and individuals hired are used to the greatest extent possible as delineated in that plan. The Agency is furthering this effort by requiring all construction contracts using CDBG monies have at minimum 25% of the contract award go to Section 3-based businesses, Small Business Enterprises (SBEs), Minority Based Enterprises (MBEs) and Women-Owned Enterprises (WBEs).

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 4 Action Plan Lead-based Paint response:

According to the American Community Survey, 32,713 housing units in Brockton were built prior to 1980 and of these 21,728 were built before 1950. Lead was widely used in interior and exterior paint prior to 1978 when its use was banned by the Environmental Protection Agency. No reliable calculation exists as to the number of Brockton housing units containing lead paint, although it can be assumed that a number of older properties, have lead paint present. Overtime a number of properties have been de-leaded through various state and federal programs to encourage de-leading, so the number with lead paint is slowly diminishing. The following table shows the decline over time due to a variety of actions:

Table 4: Lead Poisoning in Brockton

5 Year Period	Number of New Cases	Adjusted Rate
1997-2002	123	6.6
1998-2003	89	4.7
1999-2004	76	4.1
2000-2005	78	4.2
2001-2006	76	4.1
2002-2007	69	3.7
2003-2008	66	3.5
2004-2009	56	3.0
2005-2010	47	2.5

In 2010, Brockton was ranked 6th in the State for the incidence of lead poisoning

The key strategies for addressing the problem during the next year are as follows:

1. The City of Brockton's systematic code enforcement inspections.
2. The lead remediation program administered by Self Help, Inc.,
3. The BRA and BHA's CDBG-funded and HOME-funded property rehabilitation programs and property rescue efforts.
4. MassHousing's "Get the Lead Out" program.

5. The BRA's housing rehabilitation program which requires testing for lead paint in any unit to be rehabilitated with children under the age of 8 in residence.
6. Work with HUD's Office of Healthy Homes, the State Department of Public Health, the local Board of Health and Building Department, to provide information booklets and outreach programs to make residents aware of lead based paint hazards and to generate referrals for lead based paint identification and abatement.
7. Partner with organizations that receive lead testing and abatement funds.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.*
2. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.*

Program Year 4 Action Plan Specific Objectives response:

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve over the next year.*

Introduction

The context for the Plan is mostly shaped by the economic and housing recession.

As the effects of the subprime lending debacle, the deep recession and the resultant foreclosure crisis continues largely unabated, the City continues to suffer serious consequences threatening much of the progress made in Brockton in recent years in terms of housing, the living environment, and social/employment status. Brockton is second only to the City of Lawrence of the list of most negatively impacted communities in Massachusetts. Because of this, it is imperative that the collaborative efforts between federal, state and local governments together with community based organizations and the private sector now underway be accelerated and expanded as possible in order to stem the tide.

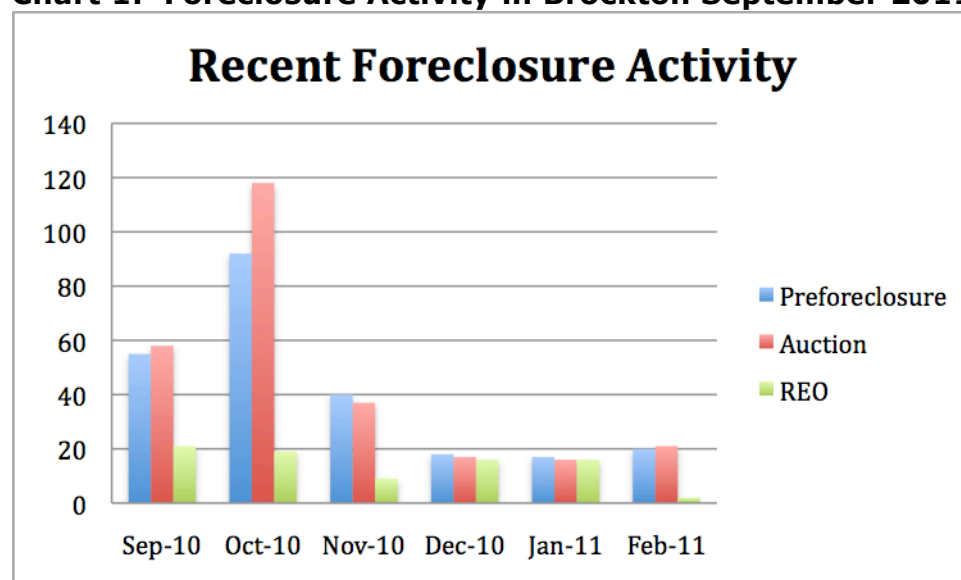
Currently (January 2011) the employment picture in Brockton is as follows:

Table 5: Employment and Unemployment in Brockton

	Labor Force	Employed	Unemployed	Area Rate
Massachusetts	3,475,200	3,174,600	300,600	8.7
Brockton	46,131	40,790	5,341	11.6

Distressed and foreclosed properties are located in every Census Tract in Brockton, with high concentrations in the tracts that were predicted in Brockton's Neighborhood Stabilization Program [NSP] application in 2009.

However after significant activity in 2008-2010, the number of foreclosure actions has slowed significantly. Some of this may be due to lender delays due to various legal issues.

Chart 1: Foreclosure Activity in Brockton September 2011-February 2011

As of March 2011, there were 184 properties owned by banks, 92 going through the auction process and 208 filed for default on the mortgage. In this the fourth year of the five year (2008-2012) Strategic Plan, Brockton will continue to address this ongoing national housing crisis.

As this crisis continues, many Brockton families and individuals are losing their homes, or face the imminent threat of losing them. Job loss, illness and other factors can turn into catastrophic housing consequences for many, not just the lowest income persons and not only those surviving from paycheck to paycheck. Home foreclosure leads to displacement of families and impacts tenants as well as homeowners. Vacant homes and buildings are a magnet for theft, vandalism, arson, drug abuse and other crimes; they quickly plant the seeds of blight and deterioration in previously stable neighborhoods. As persons and families are displaced, the strain on social service providers increases proportionately.

Shelter operators report ever greater numbers of homeless persons and families requiring support services as well as shelter. Service agencies have also witnessed an increase in the number of cases of domestic violence stemming from income loss in this severely down economy. Other outgrowths of the crisis in housing and the recessionary economy are evidenced by more home owners and renters seeking home heating and other utility payment assistance and in a rise in fires caused by improper use of space heaters. Other more subtle consequences can be seen in the increase in the number of vacant properties being stripped of copper pipes and wiring as well as heating apparatus systems and plumbing fixtures; this causes further strain on the police force as it tries to prevent theft even while it attempts to counter the health and fire safety threats posed by squatters and vagrants in vacant properties. Brockton also now struggles against the trend of single and multi-family homes illegally becoming rooming houses as individuals and families continue to be displaced.

In addition to this recent data, we have provided in Attachment B, an analysis of the 2009 CHAS data supplied by HUD. This analysis provides a picture of the housing needs of Brockton, especially of the low and moderate income households. This data referenced above together with the data collected from a variety of sources and displayed in the CPMPO Needs.xls table, influences the priorities assigned and the projects funded in the coming year.

Priorities and Objectives

Provide rehabilitation loans to 10 income eligible households of 1-2 family properties for code violation repairs and upgrade where possible to energy star efficiency

The complete list of priorities and specific objectives for housing for the fourth year (2011-2012) of the five year plan are as follows:

Table 6: Housing Priorities and Objectives

PRIORITY GOALS	Priorities 2011- 2012	Target Population
GOAL 1: PRESERVE EXISTING HOUSING		
Objectives:	Priority	Population
<i>1. Maintain, support and preserve the existing housing stock.</i>	High	ELI-VLI-LI All Types of HHs
<i>2. Prevent housing deterioration and vacancies</i>	High	ELI-VLI-LI All Types of HHs

PRIORITY GOALS	Priorities 2011- 2012	Target Population
<i>3. Prevent neighborhood deterioration due to foreclosures and vacancies through a variety of means including counseling</i>	High	ELI-VLI-LI All Types of HHs
GOAL 2: INCREASE THE SUPPLY OF AFFORDABLE HOUSING		
Objectives:	Priority	Population
<i>1. Increase the overall availability of affordable permanent housing through the creation of new units and the return to habitable status of vacant/deteriorated units.</i>	High	ELI-VLI All Types of HHs
<i>2. Preserve the quality of life in existing neighborhoods while accommodating smart growth; support a well-conceived balance between housing development, transportation, open space and recreational facilities and appropriate commercial development opportunities.</i>	Medium	ELI-VLI-LI All Types of HHs
<i>3. Housing Rehab loan programs that place affordable restrictions on rental units in owner-occupied multi-family properties throughout the City.</i>	High	ELI-VLI-LI All Types of HHs
<i>4. Support organizations using NSP funds for foreclosed properties;</i>	High	ELI-VLI All Types of HHs
GOAL 3: INCREASE ACCESS TO HOMEOWNERSHIP FOR VERY LOW, LOW AND MODERATE INCOME HOUSEHOLDS		
Objectives:	Priority	Population
<i>1. Down Payment and Closing Cost Assistance to assist low and moderate income first time home buyers who are looking to enter the housing market and purchase their first homes.</i>	High	LI All Types of HHs

PRIORITY GOALS	Priorities 2011- 2012	Target Population
<i>2. Support low and moderate income households who invest in older, more affordable housing stock in the jurisdiction through a purchase and rehab program.</i>	Low	ELI-VLI-LI All Types of HHs
<i>3. Housing counseling courses for low and moderate income households who are considering purchasing a property.</i>	High	ELI-VLI-LI All Types of HHs
<i>4. Increase and expand current fair housing activities, including affirmative fair marketing, outreach efforts and translation of vital docs.</i>	High	ELI-VLI-LI All Types of HHs
GOAL 6: HOMELESS AND AT-RISK OF HOMELESSNESS SERVICES		
Objectives:	Priority	Target Population
<i>1. Continue support to organizations that provide case management, advocacy, and court support to low and moderate income individuals who are at risk of losing their homes.</i>	High	ELI-VLI-LI All Types of HHs
<i>4. Support organizations that create or maintain permanent housing for the homeless</i>	High	ELI-VLI-LI All Types of HHs

In addition, there are a number of services and programs which will assist the achievement of the housing goals. These are listed in the Community Development section below. There are also non-homeless special needs groups needing action and these are listed in that section below.

The proposed outcomes for the housing initiatives are as follows:

Table 7: Proposed Housing Outcomes and Measures

<u>Agency Program. Activity Description. Activity Description.</u> <u>Goals</u>	<u>Proposed</u> <u>Objective</u> <u>Category</u>	<u>Proposed</u> <u>Outcomes</u>	<u>Outcome</u> <u>Indicators</u>
<u>NHS of the South Shore – First Time Homebuyer and Personal Financial Education Program</u>			-
In an effort to deal with the causes and effects of the foreclosure crisis in Brockton, the BRA will partner with NHS to provide housing services to help stave off foreclosure and prevent displacement of tenants as well as homeowners. There are programs. One will support the foreclosure counseling services to Brockton residents. This program will allow the Brockton NeighborWorks Homeownership Center to offer Homebuyer Education Workshops. It is estimated that the program will educate over 350 potential homebuyers to become educated and successful homeowners. The second program is to provide Foreclosure Counseling services to residents who are at risk of losing their homes. Some will go through foreclosure, shortsale or deed-in-lieu. Others may save their homes by working with lenders through modification, repayment plan or forbearance. NHS intends to bring the most positive outcome possible for each client and help secure their financial future through education.	Sustainability	Creation of additional low income homeowners. Preservation of existing homeowners	18 new homeowners. 225 homeowners preserved in place.
<u>First Time Homebuyer Assistance</u>			-
HOME funds to provide down payment assistance, and reasonable closing costs for eligible low/moderate income home buyers citywide. Recapture provisions are required calling for repayment on an annual declining balance basis if the property is sold within varying time periods keyed to the amount of assistance received.	Availability, Affordability	5 households will purchase homes with down payment assistance	number of actual homes purchased with down payment assistance
<u>New Rental Construction: Brockton Housing Authority</u>			-
The Brockton Housing Authority (BHA) will utilize HOME funds to construct a duplex located at Plot 48-2 Tribou Street, as additional affordable housing opportunities in Brockton. BHA will acquire the property from the City of Brockton and construct the duplex with HOME funds and private financing and rent the apartments to low income tenants.	Availability, Affordability	Construction of rental housing	Development of 2 units
<u>Self Help, Inc. – Lead Abatement Program</u>			-
The City of Brockton has been awarded \$2,100,000 from HUD's Lead Based Paint Hazard Control program to produce 125 units of lead safe housing to residents of Brockton. The city of Brockton will contract with Self Help Inc. to implement this program. In addition, the City of Brockton, through Community Development Block Grant funding has provided funding of \$50,000.00 in matching funds that will be available to assist 20 Brockton property owners with their share of abatement costs.	Sustainability	Reduce Lead base paint in up to 125 homes in Brockton	Documentation indicating lead base paint reduction

<u>Agency Program. Activity Description. Activity Description.</u> <u>Goals</u>	<u>Proposed</u> <u>Objective</u> <u>Category</u>	<u>Proposed</u> <u>Outcomes</u>	<u>Outcome</u> <u>Indicators</u>
<u>Rental Development – Acquisition & Rehabilitation</u>			-
The Brockton Housing Authority (BHA) will utilize HOME funds to supplement a commitment of \$2 Million in grants to the Brockton Housing Authority and Southeastern Massachusetts Affordable Housing Corporation (SMAHC) from the Massachusetts Department of Housing and Community Development (DHCD) and/or other financing sources to acquire and rehabilitate abandoned bank-owned, foreclosed two or three family buildings as additional affordable housing opportunities in Brockton.	Accessibility, Affordability Availability	Restore foreclosed housing to rental use	number of homes converted into low income rental housing
<u>Southeastern Massachusetts Affordable Housing Corporation (SMAHC) (CHDO)</u>			-
Southeastern Massachusetts Affordable Housing Corporation (SMAHC), a private non-profit entity, acting as the local CHDO, will utilize HOME funds to acquire and rehabilitate single family homes and sell them to low/moderate income families as additional affordable housing opportunities in Brockton. SMAHC will use CHDO proceeds from the sale of the CHDO developed homeownership units for HOME-eligible or other housing activities to benefit low/moderate income families.	Affordability, Availability, Accessibility	creation of one unit of affordable homeownership	# of affordable homeownership housing units created
<u>Homeowner Housing Rehab</u>			-
The Brockton Redevelopment Authority will provide funding in the form of deferred payment loans to qualified low and moderate income property owners in the City of Brockton. The funds will be expended according to the scope of work to be completed and will not exceed \$30,000.00. For single family applicants, this will be an interest free loan for qualified applicants who meet income guidelines established by the U.S. Dept. of Housing and Urban Development. A lien will be placed on the property. Should the owner sell, refinance or transfer the property, the total amount of the loan must be repaid at 0% interest. No properties with more than 2 units will be considered. At least 51% of the total units must be occupied by low and moderate income households.	Sustainability	Rehab of homes	10 units rehabbed
<u>Self Help, Inc. – Landlord Training Program</u>			-
Funding is to be used to conduct a Landlord Education Course to educate low and moderate income landlords and landlords to be of multi-family properties as to their duties and rights with respect to tenants. Training will focus on budgeting, maintenance, requirements of sanitary codes and the provisions of fair housing laws. The main objectives of the program are to educate landlords, reduce the number of vacant and abandoned property, provide successful home ownership and rentals to low and moderate income families and provide a healthy home environment. CDBG funds will be used to provide partial salaries to the program coordinator, consumables required for class attendees, contract with sub-grantees and continued program certification.	Sustainability	Improved understanding of property management	125 landlords educated.

<u>Agency Program. Activity Description. Activity Description. Goals</u>	<u>Proposed Objective Category</u>	<u>Proposed Outcomes</u>	<u>Outcome Indicators</u>
Capstone Communities LLC will utilize HOME funds to redevelop the Knight Building located at 124 Montello Street into 25 units which will consist of affordable, workforce and market rate mixed income housing. Capstone Communities plans on utilizing HOME funds from DHCD and Brockton, DHCD tax credits and CATNHP funding and federal and state historic tax credit equity. Station Lofts is located in the heart of Brockton's downtown and is located in the Downtown Brockton Smart Growth Overlay District (DBSGOD) Downtown Core Sub-District. The site is one block from the MBTA Commuter Rail Station.	Availability, Affordability	Convert vacant property to 25 units of rental housing	Building space converted into at least 25 units of rental housing including 14 affordable units.

Needs of Public Housing

- 1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.*
- 2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.*

Program Year 4 Action Plan Public Housing Strategy response:

- 1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.*

The City has extremely limited resources to assist the needs of the BHA and its clients, especially when compared with the needs of those who do not have access to affordable housing.

The BHA works with residents in Low Rent Public Housing and with participants in the HCV and MRVP voucher programs. It has established successful Family Self Sufficiency (FSS) programs for all these clients of the BHA. FSS programs develop self-sufficiency and provide financial incentives for households seeking to become homeowners and/or providing educational tuition assistance.

The BHA Family Self Sufficiency Program continues to be successful. HUD originally mandated the Brockton Housing Authority to enroll and graduate 50 families; the BHA has in fact helped sixty-six families become free of all forms of government assistance. Most FSS graduates (a total of forty-one,) become first time, low-income homeowners and these successes continue despite the crises in the credit markets. Even with these market conditions, during 2010 one family used their escrow funds to purchase a home and one graduate received her Bachelor's of Science Degree. Others are positioning to follow in 2011. Meanwhile, our remaining participants continued to increase their FSS Escrow Account Balances, search for or maintain employment, or complete their education with the goal of becoming fully employed.

In addition, the Brockton Housing Authority has operated a voluntary Public Housing FSS Program since 1998.

Homeownership tends to be the end result of our program, however much happens while residents are working towards this goal. Families enter the program under-employed and living beyond their means, with personal finances in disarray. Under the tutelage of our program, residents learn that education is the key to full employment, and they attend credit repair and financial education workshops to help them prepare for a better future.

The BHA has begun taking this expertise to other Housing Agencies.

The results of this program for the last year are as follows:

Currently enrolled:	43
Number of escrow Accounts:	24
Average Balance:	\$7,594
Participants in Post-secondary Education:	9
Participants in GED preparation/ESL classes:	2
Participants who increased earned income:	6
Participants who found a job during this period:	5
Participants who are pre-qualified for a mortgage and searching for a home:	3
Participants who started a small business during this period:	2
Purchased a home in 2010:	1
Completed Credit repair or budgeting class:	6
Total number of homeowners since 1996:	42
Number who grew their income to the point they exceeded assistance from HUD's HCV or Public Housing program:	16
Total number of Participants graduating since 1996:	58

The Brockton Housing Authority (BHA) is committed to informing it's participants about the possible benefits of Home Ownership through the use of their Section 8 Voucher. This option is used to assist a family residing in a home purchased and

owned by one or more members of the family. A family assisted under this option may be newly admitted or an existing participant in the HCV Program.

To that extent, the BHA has created the position of Home Ownership Leasing Officer to assist HCV Program participants in making a decision as to whether or not Home Ownership is a viable option for them. This person will explain and screen potential participants, prepare all paperwork for qualified participants prior to entering into Homeownership HAP contracts. In addition, this person will maintain the files in compliance with all applicable regulations and will work closely with the FSS Coordinator to identify potential new participants.

At this time the BHA has three families currently utilizing their HCV to help with their homeownership.

The Brockton Housing Authority is willing to use Section 8 project-based assistance to support the construction of additional affordable housing units in the City of Brockton. The BHA is open to project applications from community-based housing developers or other potential affordable housing development partners. As the HUD regulations permit up to 20% of the allocation to be used for this purpose, this has the potential for developing more affordable housing units in Brockton. In addition the State has the potential to create project based housing units.

The Capital Fund Program of HUD for Federal developments owned and operated by the BHA, provides resources to modernize these developments. The major initiatives for 2011-2012 are:

Implementation of Energy Services Agreement in all Federal

Developments: This is a \$5.1 million undertaking with AMERESCO that will implement energy efficiency measures throughout the Authority's federal developments. These actions run the gamut from simple water saving devices, such as low flow shower heads and toilets, to the \$4.5 million installation of new energy efficient windows and doors at Campello High Rise. Also, new Energy Star rated refrigerators and energy efficient lighting will be installed in many apartments and common areas will also be addressed.

Comprehensive Modernization of Caffrey Towers: The resumption of this program will be in multiple phases. The first phase will concentrate on Barrier Free access issues: entranceways / automatic door openers, common areas, walkways and curb cuts, and parking lot demarcation will be addressed initially. A second phase will address the conversion of an additional 5 to 8 units to barrier free / visual and audio impaired apartments. The third and fourth phases will deal with the modernization of the remaining 150 apartments and the creation of a single mutual entranceway into the two buildings with shared community spaces. It is anticipated that this work will require \$7 million in funding and take over 4 years to accomplish.

Completion of the Federalization of Belair Tower: The last remaining project to be completed under the terms of the Federalization Program will be the

replacement of all windows and doors in the 269 units and common areas of Belair Tower. This is a \$2.9 million project that should be completed early in 2012.

2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

The BHA has not been designated as troubled by HUD and there are no indications that it has been performing poorly.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 4 Action Plan Barriers to Affordable Housing response:

There is a state law [Chapter 40B] that requires local governments to have at least 10% of its housing stock subsidized and dedicated to households below 80% of median, in order to retain full control over the zoning permit process when affordable units are proposed. The nature of that affordability is defined by the state and generally must be for at least 15 years for rehabbed housing units and 30 years for newly created units. The law gives the state the power to override local decisions regarding affordable housing projects, whether those decisions are based on zoning by-laws, or other arguments such as impact on schools, environmental issues, infrastructure limitations etc. A local community can amend its by-laws and procedures for a specific project and gain exemption from this law under what is known as and what is controlled by state regulations – Local Initiative Plan or LIP. Brockton is above the 40B threshold but it can still use the LIP process to approve affordable housing developments.

Table 8: Chapter 40B Units

22-Dec-10	2000 Census Year Round Housing Units	Total Development Units	SHI Units	%
Brockton	34,794	4,486	4,486	12.90%

The City has taken steps to create zoning which will promote affordable housing development such as Chapter 40R. The City of Brockton has designated five "Smart Growth" development districts which provides incentives for the development of affordable housing adjacent to transportation centers.

The City has also been exploring the use of an overlay zoning to facilitate this use.

Limited public funding and private investment interest are remaining barriers to increasing the supply of affordable housing. Nevertheless, the City is taking steps to create attractive development and redevelopment opportunities including improving the appearance and curb appeal of business districts, by demolishing derelict buildings and by clearing and cleaning-up vacant lots.

Other strategies which can be looked at in the coming years are:

Zoning Relief and Other Bonuses

State and case law permits local jurisdictions to provide a variety of benefits to a developed, such as a density bonus in exchange for reserving a percentage of housing units for low and moderate income or senior households for specified periods of time.

Inclusionary Housing

Inclusionary Zoning has become a more common tool for communities and is usually linked to the bonuses mentioned above. In strong housing markets, it is feasible for developers to meet the inclusionary zoning requirements without other subsidies. In a market such as Brockton's, subsidies would be needed.

Commercial/Industrial Linkage Fee

The concept is that most commercial and industrial development relies on a number of employees who are paid less than 80% of median. So by requiring some effort to provide funds to enable these employees to live as well as work in the community by putting the money towards affordable housing development in the community, the linkage fee is a benefit to all.

Availability of Financing

Some communities have developed task forces which work with lenders operating in the community to develop agreements in conjunction with the federal Community Reinvestment Act, which will provide lower mortgage rates and other financial benefits for providers and consumers of affordable housing.

Accessory Apartments

Many communities have developed accessory apartment provisions in the zoning code, which in effect permit homeowners, especially single family homeowners, to provide an additional housing unit either within the existing house or as an addition, provided that one of the households meets the eligible income limit. This code provision has the added benefits of legalizing a number of illegal uses and also of developing housing in communities with little or no land availability.

Gap Financing and Fee Reductions

Some communities use HOME funds, redevelopment set-aside funds, and Housing Trust Funds (set up under inclusionary zoning and linkage programs) to provide 'gap-financing' for affordable housing projects in order to mitigate the impacts of market factors (such as land costs and construction costs), planning and development fees, on-site and off-site improvements, infrastructure and utility connection and other costs associated with residential development.

Some communities provide permitting fee reductions for projects which provide affordable housing.

Permit Processing

A community can set up an expedited processing system for any project which is providing affordable housing. This program establishes an aggressive processing timeline to cut the cost and time constraints associated with building affordable housing by:

1. Providing mandatory preliminary review meetings for early staff feedback;
2. Significantly reducing project review cycles;
3. Funding environmental, traffic impact and other studies after preliminary reviews.

Compounding the need for affordable housing has been the loss of many units due to foreclosure. While these were not necessarily owned or occupied by households below 80% of median, it is reasonable to assume that a number of them were.

7% of owner units and 97% of rental units which were vacant in the ACS report for 2007 were affordable to households below 80% of median. Since then there has been a significant increase in foreclosures and a sharp decline in pricing. It is not clear what this means for the expansion of affordable housing in Brockton. There are more rental and owner opportunities for households below 80% median. However, there are also unemployment and underemployment of households which can offset the cheaper prices. The City has used NSP and other funds to acquire and rehabilitate foreclosed properties and through its down-payment program it can also enable households to take advantage of any lower cost housing put on the market.

HOME/ American Dream Down payment Initiative (ADDI)

1. *Describe other forms of investment not described in § 92.205(b).*
2. *If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.*

If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:

- a. *Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.*

- b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.*
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.*
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.*
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*
- 3. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:*
 - a. Describe the planned use of the ADDI funds.*
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.*
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.*

Program Year 4 Action Plan HOME/ADDI response:

- 1. Describe other forms of investment not described in § 92.205(b).*

None are proposed in the fourth year.

- 2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.*

The purpose of the resale and recapture provisions is to ensure that the housing purchased with HOME assistance remains affordable to low income buyers in accordance with 24 CFR 92.254 and to provide the initial home buyer with a fair return on investment. The City acknowledges the potential conflict that can arise in meeting these two purposes and attempts to balance them.

For the Homebuyer Program which uses HOME funds to provide down payment and closing cost assistance for homebuyers wishing to purchase in the jurisdiction who are at or below 80% of median family income, the City has adopted the following provisions concerning resale and recapture:

- a) Recapture may occur not only when the premises are sold, but also if the premises cease to be the borrower's primary residence, death of the borrower occurs or there is a change in the title within 5 years.
- b) HOME funding will be used for down payment and closing cost assistance (up to \$9,000 for single family). These funds take the form of 5 year forgivable deferred payment loans, 20% of which will be forgiven each year of occupancy by the new home owners. Upon sale or transfer of the property, the outstanding balance of the down payment and closing cost loan is due.
- c) All recaptured funds will be used to assist HOME eligible projects outlined in the Annual Plan in accordance with 24 CFR 92.254.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt.

No refinancing is proposed in the fourth year.

4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives.

ADDI has been discontinued.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

- 1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.*

2. *Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.*
3. *Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.*
4. *Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.*
5. *Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.*

Program Year 4 Action Plan Special Needs response:

1. *Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.*

Brockton is a member of the Brockton/Plymouth City & County Continuum of Care. The primary decision-making group is the Plymouth County Housing Alliance (PCHA). Brockton is the largest of the two cities located within the PCHA area. It also represents 85% of the homeless population. In serving both individuals and families, McKinney-Vento funds are used to address the needs of the homeless. Current projects funded through McKinney-Vento are concentrated on providing permanent affordable housing with services for chronically homeless individuals and families. Similarly, pending new projects are concentrated on permanent supported housing. In each case, the housing assistance is provided through leasing of existing units. Historically, City of Brockton CDBG funds have been used to assist in the funding of the service components of programs designed to prevent homelessness and to move homeless into permanent housing. It is anticipated that this support will continue. CDBG dollars are also being provided to assist in foreclosure counseling for those at risk of homelessness. Homeless programs in Brockton have also benefited from the HPRP funds which were part of the Federal stimulus monies. Brockton received its own allocation and several organizations serving the Homeless received allocations directly from the State. Through state funding, assistance is provided locally through DTA (Department of Transitional Assistance) and the Division of Housing Stabilization within the Department of Housing and Community Development. In 2009, The PCHA, in collaboration with

the Quincy/Weymouth Continuum of Care, launched the South Shore Regional Network to End Homelessness (SSN), which continues to receive funding through the state's Interagency Council on Housing & Homelessness (ICHH). The SSN also coordinated the use of HPRP funds, which have now all been committed. Wherever possible, non-profit organizations and agencies have utilized private grants and foundation monies to augment their budgets for homeless needs. To date, only a limited amount of City HOME dollars have been available for proposed development of permanent assisted housing for homeless individuals and families. With additional dollars, local non-profit developers with proven track records of developing housing for this population could leverage multiple sources of other funds which together would provide the required budget to build the project.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

There are two interrelated groups who are the primary movers in addressing the priority needs of the homeless population in Brockton. In conjunction with their activities, the City of Brockton is beginning its 5th year of a Ten Year Plan to End Chronic Homelessness.

The PCHA Continuum of Care continues to emphasize the need to provide permanent supported housing for those who are homeless, in emergency shelters or in transitional housing in Brockton. With the exception of the recently opened Spring Street Housing, all permanent housing opportunities specifically for the homeless, have been provided through leased units. In 2010, through the renewal of existing McKinney Vento projects and the funding of two additional projects. 40 units of scattered site permanent housing is being provided, 32 of which include services through HUD.

Spring Street Housing, developed and operated by Father Bill's & Mainspring, is a newly constructed 32 unit development, created with multiple funding sources including McKinney Vento, State funds and City of Brockton HOME funds. Sixteen units are permanent housing and sixteen are transitional units for homeless veterans.

As discussed above, in 2009, the South Shore Regional Network to End Homelessness (SSN), was created. It is one of ten regional networks across the State, bringing together community agencies, government, faith groups, and businesses to implement regional strategies to prevent, reduce and end homelessness in Brockton and surrounding South Shore Communities. The Regional Network is moving from an emergency shelter focus to housing focused strategies. Accomplishments during the first eighteen months include the following:

- 319 homeless families moved to housing, 77% with flexible rental funds.
- 360 homeless families were assessed and kept local using the new sheltering approach of "triage" (immediate assessment, matched to resources based on

their needs and helped to exit shelter rapidly for housing or other appropriate settings).

- 385 homeless individuals successfully exited shelter: 266 moved to housing and 119 to substance abuse treatment or other systems of care.
- 450 families on the verge of becoming homeless were housed.
- 25% of the approximately 40 families who seek shelter from the state each month are diverted by community agencies to remain in housing, when flexible funds are available.

In addition to housing and related services, Father Bill & Mainspring operate the program, Work Express, which receives assistance through the CDBG program. Work Express is an intensive program offering work experience, support services and transitional housing. It is available to homeless individuals who are committed to stabilization, sobriety and recovery. The goal is to prepare participants for future employment and housing by emphasizing stability, life skills and work discipline.

As always, inadequate financial resources to address an expanding problem of homelessness in the current economic environment, is an obstacle in meeting the needs of this population. The continuing impact of the foreclosure crisis is an exacerbating factor that has produced a growth in the number of working poor homeless. At the same time the multipronged approach necessary to deal with a substantial segment of the homeless population requires funding for supportive services. There are several obstacles that could be addressed, without additional funds. If State Emergency Assistance (EA) regulations were more flexible, funds designated for shelters could be redirected to housing stabilization. A reform in EA eligibility could enable the agency to prevent homelessness and reduced reliance on shelters. Finally, HPRP funds have been used to help achieve the accomplishments outlined above. However, all of these funds have been committed and are expected to have been expended by September, 2011.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

In addressing the needs of the chronically homeless, there is a multi-pronged approach; prevention, aggressive outreach, assessment and case management, mainstreaming benefits and resources and housing. Housing must be linked to stabilization and community-based services that will ensure successful tenancies. The strategies identified are central to the focus of addressing chronic homelessness. Chronically homeless individuals are likely to also suffer from the effects of substance abuse and/or mental illness. A national homeless study conducted by the National Coalition for the Homeless indicated that 25 percent of the homeless suffer from mental illness and that 60 percent of homeless individuals are drug dependent. Permanent supportive housing is a high priority for the chronically homeless population. In accord with the identified needs in Brockton, housing for the chronically homeless is a priority. The projects currently serving chronically homeless include:

- Spring Street Housing- 16 units permanent housing/16 units transitional housing for individuals
- Home and Healthy for Good-5 leased scattered site units funded through MSHA
- Secure Home-7 leased scattered site units for individuals
- My Home Three – 3 leased scattered site units for individuals
- Old Colony YMCA – 5 leased scattered site units for 5 families with hoh with disability

In addition, PCHA has submitted two new projects, one for 3 leased units for individuals and one for 7 leased units, 4 of which are for individuals and 3 for families.

There are also several emergency shelters in Brockton:

- Old Colony YMCA – David Jon Louison Family Center-family shelter
- Old Colony YMCA – Brockton Family Life Center-family shelter
- Mainspring House – individual shelter
- Penelope's Place (Health Imperatives) – domestic violence shelter

As mentioned above and detailed in earlier Action Plans, the City of Brockton has a 10-Year Plan to End Chronic Homelessness. The following provides a five-year status update of the Plan:

"Chronically homeless individuals are long-term shelter stayers or are living on the streets, with substance abuse, mental illness or other disabling conditions. They often cycle in and out of emergency rooms, substance abuse treatment, or other services at great public cost and at continued detriment to their wellbeing.

The Plan offers a strategy to end chronic homelessness for these individuals that improves their outcomes and reduces the public expenses associated with ongoing crisis living. Below is a summary of progress to-date.

PROGRESS:

1. **More Housing Units:** *In five years, Brockton went from 0 to 37 permanent supportive housing units designated for chronically homeless individuals. The tenants came from MainSpring House shelter or directly from the streets. They have a case manager and receive other services to help them remain housed. (See Attachment 1)*
2. **Fewer Homeless People on the Streets:** *In five years, Brockton saw a 77% drop in homeless people sleeping on the streets, nearly all of whom had been chronically homeless. More people came indoors to MainSpring House shelter when barriers to accessing a bed were eased for people dealing with substance abuse or other challenges. Shelter occupancy jumped by 55% as a consequence, with the shelter in overflow. (See Attachment 2)*

3. **Better Assessment and Outcomes for Sheltered Homeless:** *Since 2009, Father Bill's & MainSpring has applied a new approach of immediate assessment and triage of guests at MainSpring House shelter. More people than before are exiting to housing, substance abuse treatment, and other services. (See Attachment 3)*
4. **Moving Toward "Zero Tolerance" of Discharges to Shelter by Other Systems:** *For the past three years, Father Bill's & MainSpring has tracked data on discharges to MainSpring House shelter from jails, hospitals, substance treatment programs, and other state systems of care. The data was presented to the Lt. Governor and MA Interagency Council on Housing & Homelessness for attention by state agencies. (See Attachment 4)*
5. **Jobs and Housing for Work Express graduates:** *In fiscal year 2010, there were 17 Work Express graduates: 65% had secured jobs, 94% had moved to housing; several had once been chronically homeless.*

OBSTACLES TO ADDRESS:

Leveraging Housing Resources: *To continue the Plan's progress toward ending chronic homelessness a critical obstacle must be addressed—resources for more permanent supportive housing. The City of Brockton has a resource that could help even in the current fiscal climate. A relatively modest investment of Brockton HOME funds could leverage significant resources from other public and private sources to create more housing units."*

4. *Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.*

Preventing further homelessness is a priority for the City Of Brockton. The breadth of the population dealing with the potential of homelessness has grown dramatically. Agencies throughout the area have seen a dramatic increase in those with long-term work histories at significant risk of losing their housing, due to unemployment and underemployment. Hundreds of households have been at risk of foreclosure, either as part of the sub-prime loan crisis or due to economic hardship. As of March 28, 2011, there are 196 bank-owned properties due to foreclosure and 200 properties in default.

During the past 18 months, under the coordinated effort of the South Shore Network to End Homelessness, flexible funds have been used to pay for short-term client rents and services to locate and keep housing. While some families and individuals with disabilities need longer-term housing subsidies and services to exit shelter, many people can move rapidly with flexible supports.

As indicated in earlier sections, Brockton has utilized Homeless Prevention and Rapid Rehousing (HPRP) funds. Brockton received \$ 610,110. In addition, Father Bill & Mainspring received 1.4 million and Brockton Area Multi Services, Inc. (BAMSI) received \$ 383,000 in HPRP Funds through the State. Although this was a

regional allocation, a substantial portion of the funds have been used in Brockton. All funds have been committed and will have been expended by September, 2011. Although the money could be used over a 3 year period, the need was so great that the administering organizations committed to use it within two years.

A number of programs are in place in the City that address the needs of the at-risk homeless. Two of the key programs receive assistance through the public service component of the CDBG program. Helpline is a longstanding program run by Brockton Area Multi Services, Inc. (BAMSI). It incorporates two programs: 1) an information, referral and advocacy program identifying resources for households at risk of homelessness(in the past 12 months, they received 419 telephone calls for assistance) ; 2) housing assistance for those who are EA eligible by directing these households to emergency assistance in order to divert them from shelters.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Brockton's Ten-Year Plan contains a detailed and comprehensive Discharge Coordination Policy as follows. The Plan states that the quickest and most efficient way to end chronic homelessness is to prevent homelessness from happening at all. In Brockton, an average of 10-15 discharges from other systems of care occurs monthly. In these cases individuals are discharged from state care, county jails, or private hospitals with no place to go and instead end up in emergency shelters in Brockton. The PCHA is working to reduce this problem through the efforts of the South Shore Regional Network's Leadership Council and by working closely with such state agencies as the Department of Youth Services, the Department of Social Services, the Department of Corrections, the Bureau of Substance Abuse Services, the Department of Mental Health as well as with regional hospitals and Plymouth County courts. The intent is to better coordinate and to provide housing alternatives as well as mental health and substance abuse services for homeless individuals.

Action steps include:

- Advocating for an increased number of substance abuse services and programs for homeless individuals.
- Working in accordance with the state's ten-year plan with the Interagency Council on Homelessness to implement the **zero tolerance policy for inappropriate discharges** by state agencies, and the prioritization of persons experiencing chronic homelessness within these systems of care so that anyone willing to accept treatment shall be granted such help regardless of insurance status, length of stay, or other barriers.
- Continued documentation of inappropriate discharges and continued sharing of the data with the Interagency Council on Homelessness.
- Continuing coordination of substance abuse and mental health issues for

persons experiencing homelessness in Brockton.

- Working with Federal and State Department of Veterans' Affairs in identifying and providing services to Veterans who are returning home and who may be at risk of becoming homeless.
- Seeking funding from state systems of care and local government to provide supportive services for discharge planning and follow up care.
- Coordinating volunteers, Community and faith based organization efforts to provide services and care for homeless individuals in Brockton.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 4 Action Plan ESG response:

Not Applicable

COMMUNITY DEVELOPMENT

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. *Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.*
2. *Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.*

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 4 Action Plan Community Development response:

1. *Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public*

improvements, public services and economic development.

This section of the Annual Action Plan discusses the non-housing community development needs within Brockton. The City of Brockton, under the leadership of its Mayor, works to encourage economic activity, eliminate slums and blight in targeted areas and improve conditions in areas that meet the low and moderate income threshold.

Community development priorities were based on the City's ongoing evaluation of public infrastructure and programmatic needs among low and moderate income households, slums and blight in targeted areas and key initiatives designed to improve quality of life and economic opportunities. In addition, the Consolidated Plan planning process has engaged Brockton residents and public service providers, experts and other officials to identify priority community development needs. Some neighborhoods in the City have outdated and aging infrastructure in need of repairs. Programs are needed to improve neighborhoods. Such area improvements serve to enhance privately available services, expand employment and improve community life.

The City continues to support expanded recreational opportunities and necessary public facilities which meet the diverse needs of the population, especially children, youth, elders and households with low and moderate incomes. The City places a high priority on continued support to public service agencies and organizations which provide essential services.

The City has also engaged in extensive, collaborative and public planning to improve economic opportunity, housing choices, public facilities and overall quality of life. The envisioned community improvements and investments will utilize public and private resources to address the needs identified through the planning process. The City's investments will add to the revitalization of neighborhoods and provide adequate infrastructure to support private housing and economic developers.

The priority community development needs were developed from the process described elsewhere in the document and reflects the City's best judgment of what should be the priorities in the next year. Clearly the economic climate may change and these priorities may change as well.

Table 9: Priority Non-Housing Community Development Needs

GOAL 4: STABILIZATION AND IMPROVEMENT OF "AT RISK" NEIGHBORHOODS		
Objectives:	Priority	Target Population
<i>1. Support projects that stabilize foreclosed properties (or properties at risk of foreclosure) or low income households at risk because of loss of income and inability to service their mortgages or who are renting in properties at risk of foreclosure.</i>	High	ELI-VLI-LI All Types of HHs
<i>2. Provision of better fire protection for housing by means of more and more effective fire equipment.</i>	High	ELI-VLI-LI All Types of HHs
<i>3. Provision of more flexible police programs to reduce crime.</i>	High	ELI-VLI-LI All Types of HHs
GOAL 5: PROMOTE ECONOMIC DEVELOPMENT		
Objectives:	Priority	Target Population
<i>1. Attracting businesses to operate in under-served neighborhoods through business planning support and infrastructure improvements.</i>	High	ELI-VLI-LI All Types of HHs
<i>2. Provide marketing and other advice to business in the downtown.</i>	Low	ELI-VLI-LI All Types of HHs
<i>3. Improve parking in the downtown</i>	High	ELI-VLI-LI All Types of HHs
GOAL 8: SUPPORT SERVICES WHICH PROMOTE SELF-SUFFICIENCY		
Objectives:	Priority	Target Population
<i>1. Provide a supportive learning environment for children which will enable them to be successful at school</i>	High	ELI-VLI-LI All Types of HHs

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

Long-term objectives

Brockton's long-term objectives under the five year (FY2008-2012) Strategic Plan are intended to advance the primary objectives of the CDBG program to provide decent housing and a suitable living environment and to expand economic opportunities, principally for low and moderate income people as follows:

- DH-1 Increase availability/accessibility of decent housing
- DH-2 Promote the affordability of decent housing
- DH-3 Help to sustain decent housing
- SL-1 Increase availability/accessibility to a suitable living environment
- SL-2 Promote affordability in the provision of public services
- SL-3 Help to sustain a suitable living environment
- EO-1 Expand the availability/accessibility to economic opportunity for low- and moderate-income persons
- EO-2 Help to increase economic opportunity through affordability measures
- EO-3 Help to sustain economic opportunity for low- and moderate-income persons

Outcomes for these objectives will be measured against:

- Increase/decrease in crime statistics or instances aided;
- Quantifiable improvements or additions to public facilities and infrastructure;
- Determination of the numbers of low and moderate income persons and families aided by public service providers who are supported in part by CDBG funds;
- Evaluation of changes in quality of life status as result of the provision of services; evaluation of actions that have served to expand economic opportunity including verification of numbers of jobs created/retained.

Short-term objectives

Brockton's short-term objectives that are intended to advance the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low and moderate income (L/M) persons, under the FY2011 Annual Plan are as follows:

Table 10: Outcomes and Outcome Indicators for Community Development

PUBLIC SERVICES			
Agency Program. Activity Description. Activity Description. Goals	Proposed Objective Category	Proposed Outcomes	Outcome Indicators
<u>Health Imperatives</u>			-
Health Imperatives – Penelope’s Place, a program of Health Imperatives, is the only Domestic Violence Shelter in all of Plymouth County. This organization has provided services to victims of domestic violence, including children, for over 25 years. During 2010, Penelope’s Place served 31 women and 29 children. The need for these services is evidenced by the fact that during all of last year, there were only 25 days in which the organization was not at full capacity. Funding for this project will provide six separate components including salary for a part time Life Skills Coordinator. Program materials, transportation costs, personal hygiene and self care items as well as appropriate attire for job searches are all part of the program.	Sustainability	Victims of domestic violence will recover and leave the shelter able to live independently	Number of people admitted and % able to leave and live independently
<u>Family and Community Resources Inc.</u>			
Family and Community Resources, Inc. services victims of domestic violence and their children who are residents of Brockton Housing Authority developments, or receive Section 8 vouchers through the Brockton Housing Authority and funding to expand services to homeless victims and their children living in hotels within the City of Brockton.	Sustainability	Assist PHA participants who are victims of domestic violence	Number of BHA participants assisted
<u>BAMSI (Brockton Area Multi Services Inc.) Helpline</u>			
Helpline is a program operated by Brockton Area Multi Services Inc., the local anti poverty umbrella organization serving the City of Brockton and surrounding areas. Helpline is an informational and referral resource that has for the past several years helped thousands of Brockton residents to locate services and assistance for a variety of needs. CDBG funds will be used to fund one (1) part time position for the Homeless Prevention Program that will assist low income households who are facing severe financial hardship which may jeopardize their housing.	Affordability	Persons assisted in avoiding homelessness	550 people prevented from homelessness
<u>BAMSI (Brockton Area Multi Services Inc.) Dorn Davies Senior Center</u>			
Located in the Campello High Rise complex with three other strategically located buildings in the city, the Dorn Davies Senior Center provides a variety of programs and services that serve the needs of senior citizens in Brockton. These services include but are not limited to Health welfare, social programs, educational programs, counseling services, support groups and a nutritional program that provides groceries to elderly low and moderate income senior citizens.	Sustainability	Provision of supplementary food supplies and other social and educational programs to elderly	3,300 elderly receive supplementary food and other social and educational programs
<u>Old Colony YMCA - Cosgrove Pool</u>			
CDBG funds will be used to provide salaries and related expenses in connection with the provision of structured recreational and instructional programs at the Old Colony YMCA Cosgrove Pool.	Sustainability	Children receiving aquatic instructions	16,000 children instructed in swimming and safety

PUBLIC SERVICES			
Agency Program. Activity Description. Activity Description. Goals	Proposed Objective Category	Proposed Outcomes	Outcome Indicators
Old Colony YMCA – Camp Massasoit			
Camp Massasoit will enable children from low and moderate income families to participate in a summer enrichment camp program. Camp participation will offer a safe and enriching experience that assists in developing the camper physically, emotionally, mentally and spiritually while in a healthy outdoor environment. CDBG funds will be used to provide transportation to and from the camp.	Sustainability	Participation in camp life by low income children and youth	100 low income children attend camp
Old Colony YMCA – Jon David Louison Family Center			
The Old Colony YMCA provides two programs for families experiencing homelessness. The David Jon Louison Center serves 19 families (approximately 19 woman and 47 children) This program provide emergency shelter and housing, case management and support services to families in order to reach a higher level of self sufficiency.	Sustainability	Move people from homelessness to permanent housing	Enable 19 homeless families to move out of homelessness.
Brockton Police Department – Mobile Anti Crime Unit			
A specially equipped and trained unit focuses on preventing crime by creating a high visibility profile and rapid response in areas frequented by known criminals. CDBG funds will provide partial funding to continue this mobile patrol. Four police officers make up two patrol cars assigned to census tracts 5104, 5108, 5109 and 5114.	Sustainability	Lowering of crime rates in designated areas	Crime rate

ECONOMIC AND COMMUNITY DEVELOPMENT			
Agency Program. Activity Description. Activity Description. Goals	Proposed Objective Category	Proposed Outcomes	Outcome Indicators
Father Bill's and Mainspring – Work Express Program			
The Work Express program is designed to provide homeless persons with an opportunity to become productive citizens of the community through employment and independence by means of transitional housing, intensive case management, substance abuse counseling and basic skills development with a primary objective of helping unemployed homeless individuals reenter the workforce. Community Development Block Grant funds will be used to pay the salary of program employees and to supplement stipends paid to the program participants.	Sustainability	Unemployed people will enter the workforce as a result of stabilization and assistance services	Number of people securing regular part-time or full-time jobs.
Associacio Cabo Verdana de Brockton – Youth Enhancement Program			
The Association is requesting CDBG funding to support partial salary of a full time Coordinator for its Youth Enhancement Program (YEP). The coordinator provides assistance in the Cape Verdiana de Brockton's continued efforts to outreach and assist youth in the City of Brockton. The Youth Coordinator is responsible for overseeing the youth programs and community outreach as well as conducting training sessions for mentors/volunteers. This after school program is a responsive, goal oriented community project aimed at an environment of cultural sensitivity and linguistic compatibility.	Sustainability	75 Youths Assiisted	Number of Youth assisted

ECONOMIC AND COMMUNITY DEVELOPMENT			
<u>Agency Program. Activity Description. Activity Description.</u> <u>Goals</u>	<u>Proposed</u> <u>Objective</u> <u>Category</u>	<u>Proposed</u> <u>Outcomes</u>	<u>Outcome</u> <u>Indicators</u>
<u>Brockton Fire Department</u>			
The Brockton Fire Department intends to purchase a new 1,500 gallon per minute pumping engine. This equipment would be located at Station 1 (42 Pleasant Street, census tract 5109) or Station 2 (945 Main Street, census tract 5116). This equipment is necessary to meet the emergency service needs of all residents of Brockton.	Sustainability	Improved fire protection for residents	Completed Fire Truck for residential and commercial properties in Brockton
<u>Section 108 Programs for Downtown Development</u>			
This is the repayment of the Section 108 loan of \$2,600,000 awarded by HUD for the rehab of the Adams Street Garage; economic development loans to Brockton businesses; the "ARRH" program which assists the City in addressing distressed vacant and abandoned properties through the court process.	Sustainability	Repayment of Loan	Repayment made
<u>Arts in the Windows</u>			
This program is intended as a means of attracting people and businesses to the central business district of the city and to generally improve the quality of life and create a more suitable living environment for the residents of this predominately low and moderate income area. The project is regarded as a high priority for Brockton in terms of altering negative perceptions of the Main Street corridor.	Sustainability	Improved business and attract new low mod customers	18 storefronts provided with art to alter negative perceptions of the downtown.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 4 Action Plan Antipoverty Strategy response:

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Most activities undertaken by the City with CDBG, HOME and other federal and state funds for low income families are efforts to reduce the number of persons in poverty and improve the quality of life for Brockton residents, either directly or indirectly. City staff also work in partnership with citizens, other City departments and the public and private sectors to accomplish its goal of reducing poverty.

CDBG programs which can be used and which directly influence the household income level include: job training, job counseling and placement, education and business development.

In the near future the focus will be on job development and economic stabilization.

CDBG and HOME programs can be used and can indirectly influence the impact on household living by those at or below the poverty level, by reducing other costs including, affordable housing, energy efficiency, public transportation and health care assistance.

In the near future the City will be funding the following indirect activities:

- Housing rehabilitation including energy efficiency improvements
- Health services – both physical and mental
- Revitalization and economic development activities

For this coming year, the City will be undertaking the following programs which it believes will impact those families living in poverty:

The City's new ConPlan offers its support of those projects and programs that bring income stability to Brockton's low and moderate income households including those projects and programs that generate or retain jobs or provide workplace preparedness programming.

In 2011-2012 the City proposes funding such initiatives including the following:

Father Bill's and Mainspring – Work Express Program

The Work Express program is designed to provide homeless persons with an opportunity to become productive citizens of the community through employment and independence by means of transitional housing, intensive case management, substance abuse counseling and basic skills development with a primary objective of helping unemployed homeless individuals reenter the workforce. Community Development Block Grant funds will be used to pay the salary of program employees and to supplement stipends paid to the program participants.

Health Imperatives – The program at Health Imperatives provides services to victims of domestic violence, including children. The need for these services is evidenced by the fact that during all of last year, there were only 25 days in which the organization was not at full capacity. Funding for this project will provide six unique components including salary for a part time Life Skills coordinator. Program consists of providing program materials, transportation costs, personal hygiene and self care items as well as appropriate attire for job searches.

Old Colony YMCA David Jon Louison Family Center – The Old Colony YMCA provides programs for families experiencing homelessness. The program provides emergency shelter and housing, case management and support services to families in order to reach a higher level of self sufficiency.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.*
- 2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.*

Program Year 4 Action Plan Specific Objectives response:

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.*

Throughout the City, there are households in various subpopulations who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service needs. These subpopulations include: elderly, frail elderly, persons with severe mental illness, victims of domestic violence, developmentally disabled, physically disabled, substance abusers, and persons with HIV/AIDS.

The City of Brockton is aware of the needs of special populations and is committed to supporting initiatives which target these populations, whenever possible, given the financial constraints of available funds at its disposal. As part of its strategy, the City has committed to use CDBG funds to assist a variety of service organizations who work with a number of these special needs populations.

The number of victims of domestic violence has increased during the past year. There were 1,470 reported incidents between January and December, 2010. Penelope's Place, a program of Health Imperatives, is the only Domestic Violence Shelter in Plymouth County (in which Brockton is the largest City). CDBG funding will be used to provide salaries, materials, assist in transportation costs and the costs of self-care items and clothing required for job searches. CDBG funding will also be provided to Family and Community Resources, Inc. which services victims of domestic violence and their children who are residents of BHA Housing or who receive Section 8 vouchers through the BHA. They are also working to expand services to victims of domestic violence who are living in hotels within the City of Brockton.

There are two separate Senior Centers in the City of Brockton. The Mary Cruise Kennedy Senior Center serves all elderly. It provides a variety of services, recreational, educational, transportation among others. The Dorn Davies Senior Center serves only low income elderly (63% of Brockton's elderly are low income

and 24% are extremely low income). This center is located in an elderly public housing complex with facilities in three other buildings in the city. The Center provides a variety of services through Brockton Area Multi Services, Inc. (BAMSI), including counseling and support groups, nutritional and health programs, educational and social programs. Of those served, it is estimated that 65-70% are frail. The Dorn Davies Senior Center has served approximately 4000 elderly (unduplicated) in these programs in the past year. CDBG funding continues to provide assistance to BAMSI.

Table 11: Non-Homeless Special Needs Housing Priorities and Objectives

GOAL 7: SPECIAL NEEDS HOUSING		
Objectives:	Priority	Target Population
<i>1. Develop services for special needs populations which have been growing in scope and size</i>	Medium	ELI-VLI-LI
<i>2. Support housing programs which serve special needs populations.</i>	Medium	ELI-VLI-LI

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

The approach to addressing the needs posed by these populations has changed over the past 20 years. In response, a variety of public and private sector resources are available to address some of the current approaches to housing and service needs for these groups. These resources are limited and insufficient to meet all the needs identified. The members of these subpopulations frequently require assistance from multiple sources, in order to succeed in daily life.

In addition to the availability of federal public housing and other federally assisted housing programs for the elderly (primarily Section 202) and for the disabled (primarily Section 811 and Section 8 Project Based Assistance), Massachusetts is one of the few states, which provides state-aided public housing for the elderly, for the frail elderly and for the non-elderly disabled through DHCD. Other state agencies serving the elderly in the City include EOEA and the EOHHS. Massachusetts also has a variety of community-based programs serving the elderly. The Brockton Council on Aging has an extensive set of services focused in its senior center (Mary Cruise Kennedy Senior Center). The City is also serviced by Old Colony Senior Services, its Area Agency on Aging. Programs implemented to meet the needs of elderly residents include subsidized housing; adult day care; home care; congregate housing; nutrition; guardianship; legal services; transportation; assistance with health care administration; social activities and coordination services for the disabled elderly.

In addition to affordability, a key issue for the physically disabled has been the inaccessibility of housing units. Funds from HOME and CDBG for housing rehab and development must meet State Codes, national ADA and Section 504 requirements. There are no housing units being developed specifically to serve the physically and other disabled populations for the coming year.

The number of adults with mental illness or developmental disabilities who are treated in institutions, has continued its dramatic decline. Correspondingly, the number receiving community-based services has significantly increased. DMH and DDS, are the primary service systems for providing services and housing (through the use of state and private housing providers), to these populations.

Individuals with Alcohol and Drug Addictions are dealt with through the network of human service providers, state and federally funded programs. The services funded through the Continuum Care that are coupled with housing provide a key source of assistance to this population.

The number of individuals living with HIV/AIDS in Brockton is 383 as of July, 2008. BAMSI currently provides services to approximately 150 individuals with HIV/AIDS. Their primary source of funding is the Massachusetts State Department of Public Health. BAMSI also has access to small amounts of money for emergency rental assistance. Many of these individuals are low-income and would greatly benefit from state or federal rental subsidies as they become available.

At the level of local government, the City has the Brockton Housing Authority, Human Services departments, Veteran's Agent and a Council on Aging, as mentioned above, all of which concentrate at least some of their services on these populations, utilizing funds from various private, state and federal sources. The specific programs being funded in 2011-2012 for the non-homeless special needs populations are as follows:

Table 12: Outcomes and Outcome Indicators for Non-Homeless Special Needs

<u>Agency Program. Activity Description. Activity Description. Goals</u>	<u>Proposed Objective Category</u>	<u>Proposed Outcomes</u>	<u>Outcome Indicators</u>
<u>Health Imperatives</u>			-
Health Imperatives – Penelope's Place, a program of Health Imperatives, is the only Domestic Violence Shelter in all of Plymouth County. This organization has provided services to victims of domestic violence, including children, for over 25 years. During 2010, Penelope's Place served 31 women and 29 children. The need for these services is evidenced by the fact that during all of last year, there were only 25 days in which the organization was not at full capacity. Funding for this project will provide six separate components including salary for a part time Life Skills Coordinator. Program materials, transportation costs, personal hygiene and self care items as well as appropriate attire for job searches are all part of the program.	Sustainability	Victims of domestic violence will recover and leave the shelter able to live independently	Number of people admitted and % able to leave and live independently

Agency Program. Activity Description. Activity Description. Goals	Proposed Objective Category	Proposed Outcomes	Outcome Indicators
<u>Family and Community Resources Inc.</u>			
Family and Community Resources, Inc. services victims of domestic violence and their children who are residents of Brockton Housing Authority developments, or receive Section 8 vouchers through the Brockton Housing Authority and funding to expand services to homeless victims and their children living in hotels within the City of Brockton.	Sustainability	Assist PHA participants who are victims of domestic violence	Number of BHA participants assisted
<u>BAMSI (Brockton Area Multi Services Inc.) Helpline</u>			
Helpline is a program operated by Brockton Area Multi Services Inc., the local anti poverty umbrella organization serving the City of Brockton and surrounding areas. Helpline is an informational and referral resource that has for the past several years helped thousands of Brockton residents to locate services and assistance for a variety of needs. CDBG funds will be used to fund one (1) part time position for the Homeless Prevention Program that will assist low income households who are facing severe financial hardship which may jeopardize their housing.	Affordability	Persons assisted in avoiding homelessness	550 people prevented from homelessness
<u>BAMSI (Brockton Area Multi Services Inc.) Dorn Davies Senior Center</u>			
Located in the Campello High Rise complex with three other strategically located buildings in the city, the Dorn Davies Senior Center provides a variety of programs and services that serve the needs of senior citizens in Brockton. These services include but are not limited to Health welfare, social programs, educational programs, counseling services, support groups and a nutritional program that provides groceries to elderly low and moderate income senior citizens.	Sustainability	Provision of supplementary food supplies and other social and educational programs to elderly	3,300 elderly receive supplementary food and other social and educational programs

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. *Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.*
2. *Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.*
3. *Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.*

4. *Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.*
5. *Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.*
6. *Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.*
7. *Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.*
8. *Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.*
9. *Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.*

Program Year 4 Action Plan HOPWA response:

Not Applicable

Specific HOPWA Objectives

1. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.*

Program Year 4 Specific HOPWA Objectives response:

Not Applicable

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

See Attachments Below

ATTACHMENT A

Public Comments and City Responses

To be added after all public hearings have been completed and the public comment period has expired.

BROCKTON HOUSING NEEDS (91.205)

1. *Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost- burden, substandard housing, and overcrowding (especially large families).*
2. *To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.*

This document presents an overall assessment of the housing and community development needs in the City based on ACS data collected from 2005 through 2009¹. The housing needs assessment provides the foundation for establishing priorities and allocating resources to address the identified needs.

Note: In the following discussion, Extremely Low Income [ELI] is <30% median. Very Low Income [VLI] is 30.1-50% median. Low Income [LI] is 50.1-80% median. Moderate Income is 80.1-95% median and Middle Income is 95.1-120% median.

Section A: *Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly*

¹ It should be noted, that for the most part our analysis in this section is based on published CHAS 2009 data, which in turn is based on the US Census American Community Survey (ACS) conducted 2006-2008. This ACS data is generated from random surveys and has larger error rates than the Decennial Census. Moreover, some of the definitions are different from the CHAS data of 2000 and some of the data which would be helpful is not available at all.

Important Note: For the CPMP needs.xls which is the file containing the Tables required by the CDBG Consolidated Plan, it is only possible to use 2000 data due to a number of mismatches and changed definitions in the ACS survey which was used by HUD for the CHAS dataset issued in 2009. However, using that data from HUD, we have developed a number of tables similar to those in the CHAS 2000 dataset. Where there are significant conclusions drawn from these tables, we have included the key findings.

persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).

The following tables outline the housing needs of groups such as extremely low-income, very low-income, low-income, moderate income, mid-level income, disabled, elderly, extra-elderly and family.

Housing Problems

Definition: A household is classified by the HUD/US Census as experiencing housing problems when one or more of the following four housing unit problems exist:

- the unit lacks complete kitchen facilities,
- lacks complete plumbing facilities,
- more than one person per room,
- a cost burden greater than 30%.

Housing Problems by Income

Definition: Renters and owners of extremely low-income, very low-income and low-income households in the City are all at risk of suffering from one or more of the housing problems described above.

Observation: Cost rather than the physical condition of the housing or any overcrowding is the overwhelming problem.

In the City of Brockton, 53% of households are low-income, earning less than 80% of median income. Data from the ACS indicates that 71% of these low-income households have housing problems. Of this low-income group, 30% are very low income, earning less than 50% of median income, and 34% are extremely low income, earning less than 30% of median income. Renters outnumber owners in the ELI group, VLI, and LI groups.

The following tables show the numbers of owners and renters with housing problems.

Table 1a: Housing Problems by Income²

Total <=80% AMI		Total 80.1%-120%AMI		Total 120.1%+ AMI		Total
Owner	Renter	Owner	Renter	Owner	Renter	All

² CHAS/ACS 2009 Table 11

Total <=80% AMI		Total 80.1%-120%AMI		Total 120.1%+ AMI		Total
5,310	7,245	2,845	320	1,015	45	16,780

As is evident from the next table, approximately one-third of ELI owners and two-thirds of ELI renters with housing problems are below 20% of AMI³.

Table 1b: Housing Problems by Income <20% AMI Level⁴

	<20% AMI	
Housing Problems	Owner	Renter
HHs with Housing Problems	395	2,065
HHs without Housing Problems	0	615

Housing Problems for the Disabled

Definition: *By definition, disabled households contain at least one or more persons with a mobility or self-care limitation.*

Observation: The disabled population accounts for 13% of the City's total population. Among the City's disabled population, a total of 62% have housing problems. However, 89% of the disabled households with housing problems are low income.

Table 2: Housing Needs of the Low Income Disabled⁵

CHAS/ACS 2009	<=30% AMI		30.1-50% AMI		50.1%-80% AMI		Total <=80% AMI		Total
Housing Problems	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI
Disabled	260	1,010	290	310	440	125	990	1,445	2,435
Not-Disabled	910	2,245	1,135	2,050	2,275	1,500	4,320	5,795	10,115
Total	1,170	3,255	1,425	2,360	2,715	1,625	5,310	7,240	12,550

Housing Problems of the Elderly

Definition: *Elderly are aged 62-74 and extra-elderly are 75 and older.*

³ The poverty level is somewhere around 20% of AMI.

⁴ Ibid Table 11

⁵ CHAS/ACS 2009 Table 3

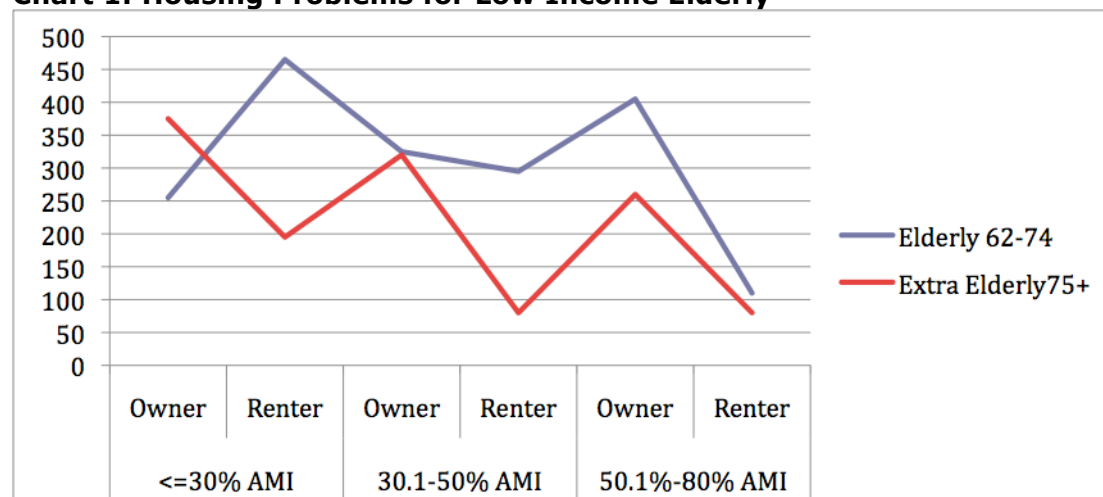
Observation: Since 2000 the elderly population in the City has decreased by 4%.⁶

Table 3: Profile of Elderly in Brockton.⁷

Elderly Profile		% of Elderly Group	% of Elderly group <=80%
Total Elderly (62-74)	5,670		
Total Elderly (62-74) <80%	3,110		
Total Elderly (62-74) <80% With Housing Problems	1,855	33%	60%
Total Elderly (62-74) <30%	1,260	22%	41%
Total Extra-Elderly (75+)	2,900		
Total Extra-Elderly (75+) <80%	2,255		
Total Extra-Elderly (75+) <80% with Housing Problems	1,310	45%	58%
Total Extra-Elderly (75+) <30%	785	27%	35%
Total all Elderly (62+)	8,570		
Total all Elderly <=80% Median	5,365	63%	
Total all elderly <80% with housing problems	3,165	37%	

At this time 42% of the City's elderly and extra-elderly population have housing problems, but those at or below 80% of median, represent 87% of those elderly with housing problems.

Chart 1: Housing Problems for Low Income Elderly



Housing Problems for Families

Definition: Families are households with at least one child under the age of 18. Non-family households are composed of unrelated individuals.

⁶ US Census Bureau, 2000, American Community Survey, 2009.

⁷ CHAS/ACS 2009 Table 5

Observations: The table below shows that small families (four or fewer persons) dominate those with housing problems.

Table 4: Housing Problems by Family Type⁸

	Family, 1 Parent		Family, 2 Parents		Non-Family		Total Family		Total
Family Size with Housing Problems as a % of All Families in Type									
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	All
Small -4 or fewer	21.59 %	29.49 %	21.55 %	5.90 %	26.32 %	29.28 %	21.57 %	15.31 %	42.85 %
Large - 5 or more	1.38%	4.64%	9.64%	3.74 %	0.42%	0.85%	6.35%	4.10%	7.51%

Housing Problem Severity

Definition: *Housing problem severity is defined as a housing unit which is substandard: lacking complete plumbing or kitchen facilities, severely over-crowded: with 1.51 or more persons per room, or severely cost-burdened: housing cost-burden over 50%.*

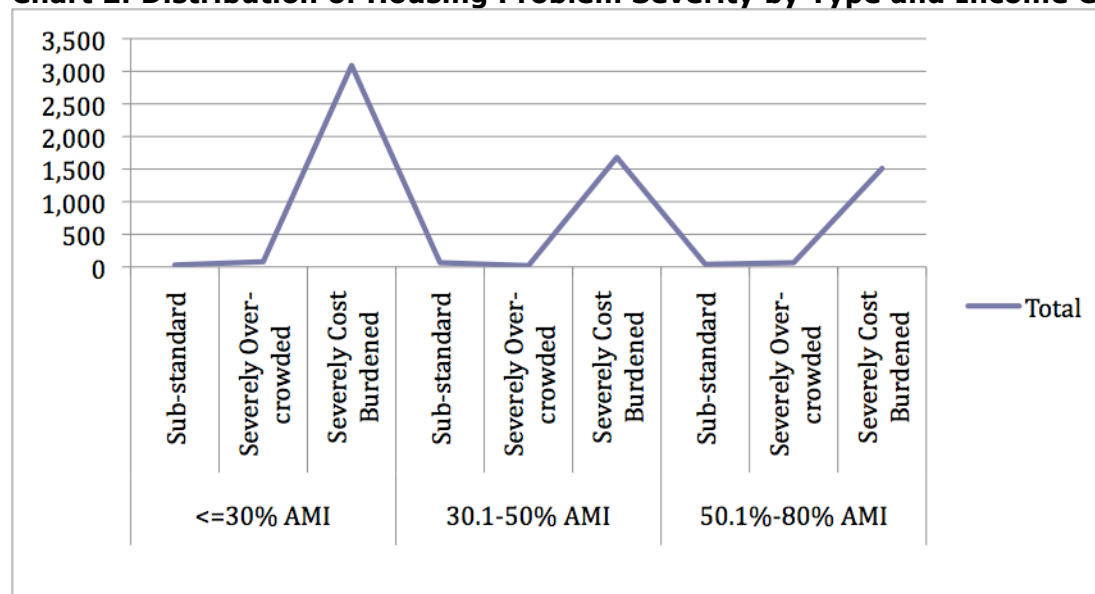
Observation: Home renters and owners who are at income levels below 80% of median income face housing problems defined as sub-standard housing, severe over-crowding and severe cost-burden. The severity of problems is a natural condition for setting priorities for the HUD programs.

96% of the City's ELI population is severely cost burdened. This is quite significant, as it can be assumed that a majority of the households being housed in public housing or using HCV vouchers would be under 30% of median.

As the Chart below shows clearly, the major problem facing Brockton is the severe cost burden for both owner and rental households.

The most cost effective programs for addressing these households in need of deep subsidies, are public housing and HCV vouchers. Other programs such as CDBG and HOME are more appropriate for targeting households above 40% of median.

⁸ CHAS/ACS 2009 Table 4

Chart 2: Distribution of Housing Problem Severity by Type and Income Group⁹

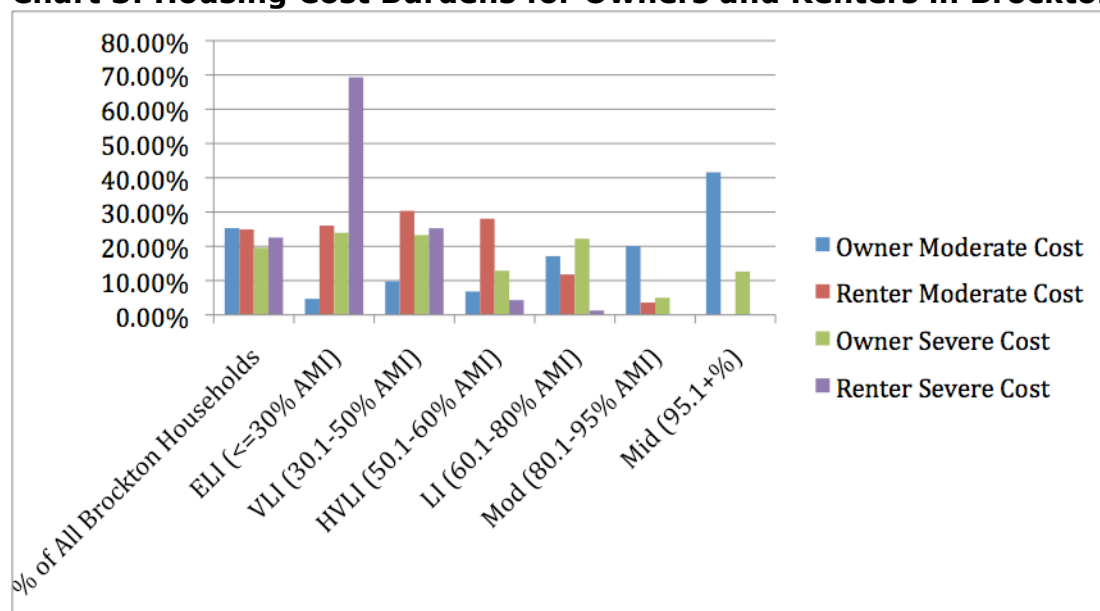
Cost-Burden and Severe Cost-Burden

Definition: As noted above, households that suffer severe cost-burden have a housing cost burden of greater than 50%. Moderate cost-burden is considered to be a housing cost burden that is greater than 30% but less than or equal to 50%. Households that do not have a cost-burden have housing costs that are less than or equal to 30% of their monthly gross income.

Observations: As noted above, the dominant housing problem facing the City's residents, is housing cost-burden. Over 45% of Brockton's households experience a housing cost burden as defined by Congress and HUD.

In more detail, 21% of all households have severe cost burdens (6,945) and 25% (8,380) have moderate cost burdens. Although the distribution is almost even, slightly more owners than renters have moderate and severe housing cost burden. The following chart illustrates the cost burdens for all owners and renters in Brockton in 2009 at differing income levels. It is likely that any changes since the ACS data was collected in 2008, will have resulted in higher rates of both moderate and severe cost burden, given the further downturn in the economy, even though housing prices have also declined.

⁹ CHAS/ACS 2009 Table 3

Chart 3: Housing Cost Burdens for Owners and Renters in Brockton¹⁰

The following tables analyze the cost burden distribution in terms of household income.

The first table shows the moderate cost burden distribution and highlights the proportions of each income group (ELI, VLI etc) as a percentage of those paying between 30% and 50% of their income for housing. These are low, moderate, and mid level income owners and renters earning below 80% of median income. The highlighted cells indicate the most notable proportions.

Table 5a: Moderate Cost Burden by Tenure¹¹

	Own	%	Rent	%	All	%
All HH	19,380		13,940		33,320	
All Moderate Cost Burden (30-50% of HH Income)	4,905	25.31%	3,475	24.93%	8,380	25.15%
ELI (<=30% AMI)	230	4.69%	905	26.04%	1,135	3.41%
VLI (30.1-50% AMI)	480	9.79%	1,055	30.36%	1,535	4.61%
HVLI (50.1-60% AMI)	335	6.83%	975	28.06%	1,310	3.93%
LI (60.1-80% AMI)	840	17.13%	410	11.80%	1,250	3.75%
Mod (80.1-95% AMI)	985	20.08%	125	3.60%	1,110	3.33%
Mid (95.1+% AMI)	2,040	41.59%	0	0.00%	2,040	6.12%

The second table shows the severe cost burden distribution and indicates that mid-income owners and owners earning less than 80% of median income pay more than 50% of their income for house. Extremely low and very low income renters comprise the greatest proportion of renters paying over 50% of their income for housing.

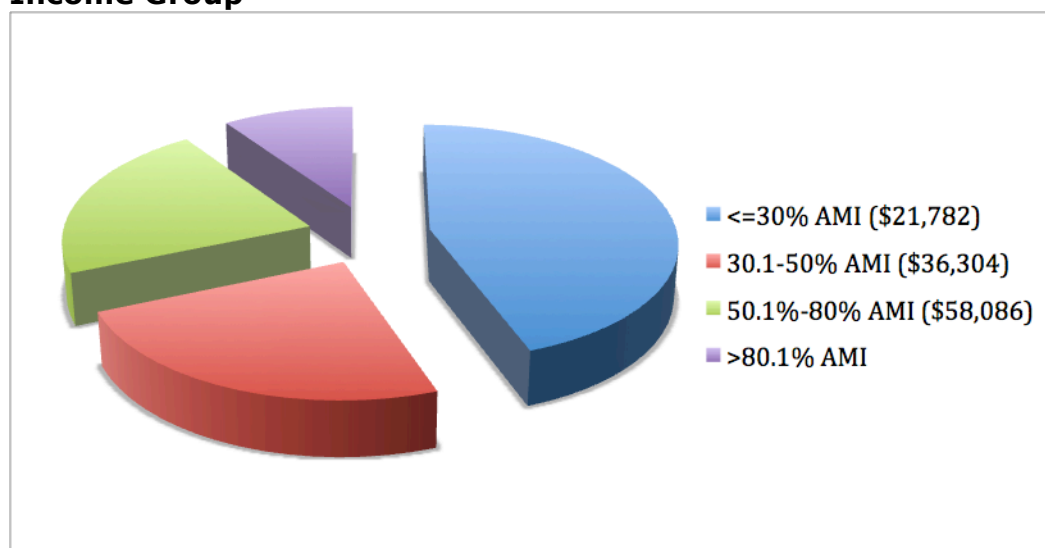
¹⁰ Ibid Table 3

¹¹ Ibid Table 3

Table 5b: Severe Cost Burden by Tenure¹²

	Own	%	Rent	%	All	%
All HH	19,380		13,940		33,320	
All Severe Cost Burden (>50% of HH Income)	3,800	19.61%	3,145	22.56%	6,945	20.84%
ELI (<=30% AMI)	910	23.95%	2,180	69.32%	3,090	9.27%
VLI (30.1-50% AMI)	885	23.29%	795	25.28%	1,680	5.04%
HVLI (50.1-60% AMI)	490	12.89%	135	4.29%	625	1.88%
LI (60.1-80% AMI)	845	22.24%	40	1.27%	885	2.66%
Mod (80.1-95% AMI)	190	5.00%	0	0.00%	190	0.57%
Mid (95.1+% AMI) as a % of all Moderate Cost HHs	480	12.63%	0	0.00%	480	1.44%

The following chart illustrates this cost burden distribution.

Chart 4: Households Paying more than 50% of Income for Housing by Income Group¹³

Substandard Housing and Overcrowding

Definition: *Substandard housing, another housing problem, is when a housing unit lacks complete kitchen or plumbing facilities. Standard housing is when the housing unit has both complete kitchen and complete plumbing facilities.*

Definition: *No overcrowding is when there is one person or less per room. Moderate overcrowding occurs when there is more than one person per room but less than or equal to 1.5 people. Severe overcrowding occurs when there are more than 1.5 people per room in the housing unit. A one-family household is a family household with no subfamilies. However a 2+ family household is a multi-family household composed of more than one family or subfamily. Non-family households are composed of unrelated individuals.*

¹² Ibid Table 3

¹³ Ibid Table 3

Observations: In general, families and non-family households did not face overcrowding in 2009. It should be noted that since 2009, when this data was developed, there has been some loss of jobs, income and housing. It would not be surprising for the Census 2010 to show an increase in over-crowding as families “double up”, which has been reported anecdotally by many service and housing organizations in Massachusetts.

Section B: *To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.*

Utilizing CHAS/ACS data from HUD (2009) we have developed the following information about the housing needs of racial and ethnic groups:

The City’s Black population in 2009 is estimated to be approximately 32% of the total population. As the largest minority group in the City, it should be looked at closely in terms of need and prospective demand on the City’s limited resources.

Table 6: Race and Ethnicity in Brockton 2000, 2009, 2010¹⁴

	2000	2009	2010
White Alone	61.83%	51.92%	46.71%
Black Alone	17.42%	32.24%	31.21%
American Indian Alone	0.29%	0.17%	0.35%
Asian Alone	2.63%	2.75%	2.29%
Pacific Islander Alone	0.03%	0.00%	0.06%
Some Other Race Alone	10.13%	8.91%	12.47%
Two or More Races	7.66%	4.00%	6.91%
Hispanic Origin (Any Race)	7.97%	9.56%	9.97%

As a whole, White owners and renters and low income Black owners and renters have comparable housing problems. A concern of HUD is when there is a disproportionate need for any ethnic group.

The impact of severe housing problems including substandard housing, severe overcrowding and severe cost-burden affect all ethnicities in Brockton. When

¹⁴ US Census Bureau, 2000, American Community Survey, 2009. US Census Bureau 2010

examined more closely by race and ethnic group, the distribution of severe housing problems by race and ethnic group does not vary from that of the overall population.

As we noted above, housing cost-burden proved to be the most significant housing problem in the City for low income households. White and Black renters and owners and Hispanic renters all experienced housing cost burden. However, no group experienced a disproportionate share of housing cost burden compared with their proportion in the population generally.

Summary Conclusion

The CPMP data tables and the tables in this document, quantify the estimated number of households who have housing problems, especially rent and ownership cost burdens. Clearly the need is greater than the supply and thus the City is faced with thinking of how it can support production programs that can close the gap. CDBG funds could be made available to Community Based Development Organizations (CBDOs) if there were any in Brockton or if any could be developed. This would enable CDBG funded new construction.

The City could adopt inclusionary zoning. This tool may not be effective in the immediate future due to the economic conditions. However it should have significant success in producing additional affordable housing over the long term. Inclusionary zoning can be combined with other programs, to reach down into households at less than 80% median. Examples of such programs are HOME and Project Based Section 8 programs of the BHA and the Tax Credit programs of the State (including 4% and 9% credit programs).

The Housing Needs Analysis shows that the most pervasive problem facing renter households in Brockton is the risk of moderate and severe cost burden of housing. Therefore the preservation of existing rental units that are subsidized, as well as those affordable rental units provided by private landlords, is an important strategy for the City. Rehab and other preservation approaches can help tremendously.

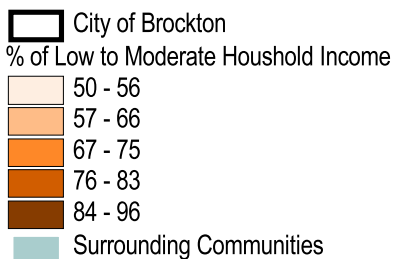
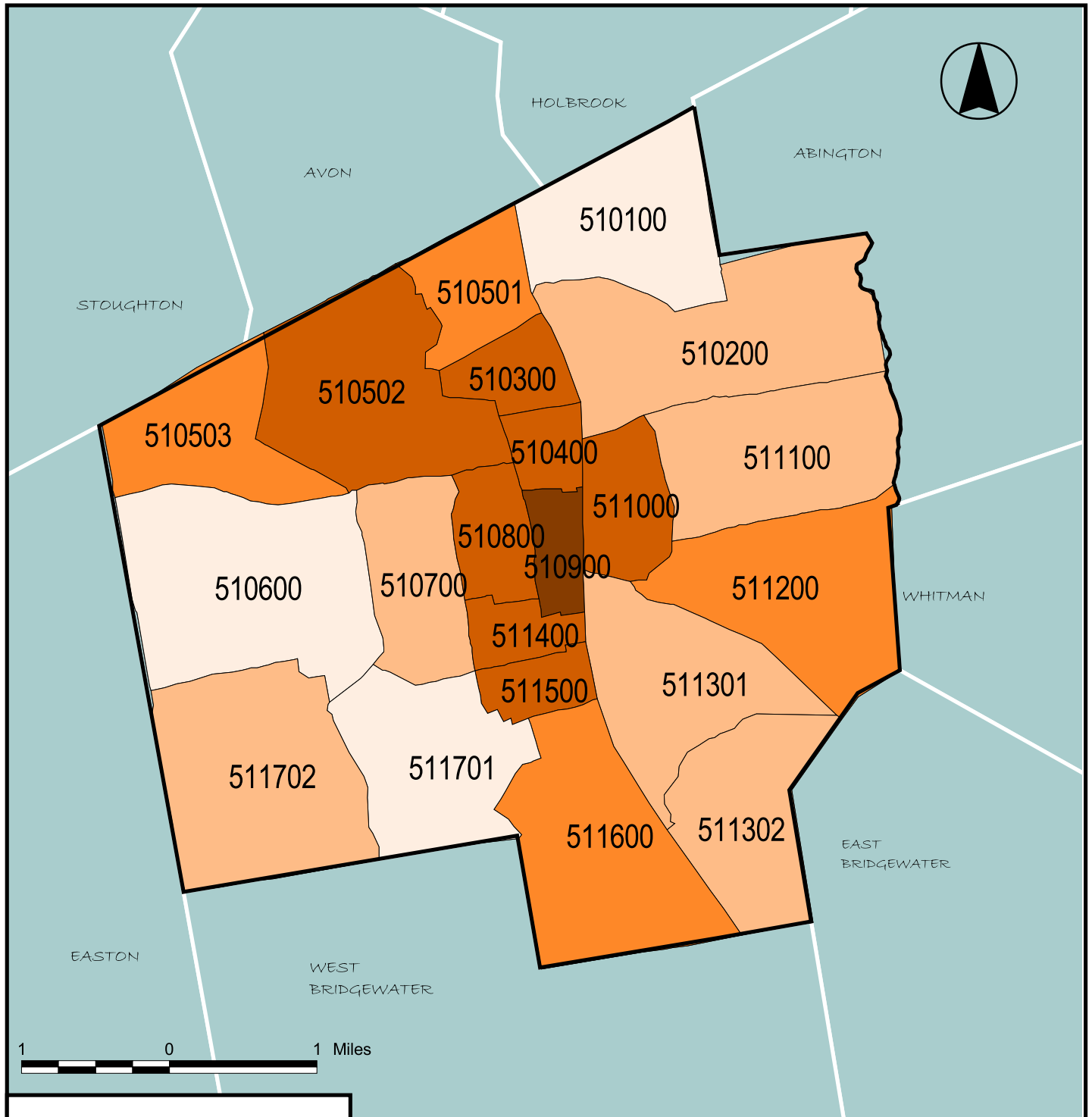
The problems of cost are also faced by owners, who are almost equally affected. There are several approaches that might be explored to address this problem. Lowering utility costs through retrofitting of energy and water improvements, can assist low income owners. Assistance with repairs to properties, especially for the low-income elderly, can also be effective.

ATTACHMENT C

Map 1: Showing Low and Moderate Income Census 2000 Tracts

% of Low to Moderate Household Income

City of Brockton
by Census Tract



Old Colony Planning Council
70 School Street
Brockton, MA 02301

GIS Data Sources:
MassGIS, MHD, U.S. Census 2000

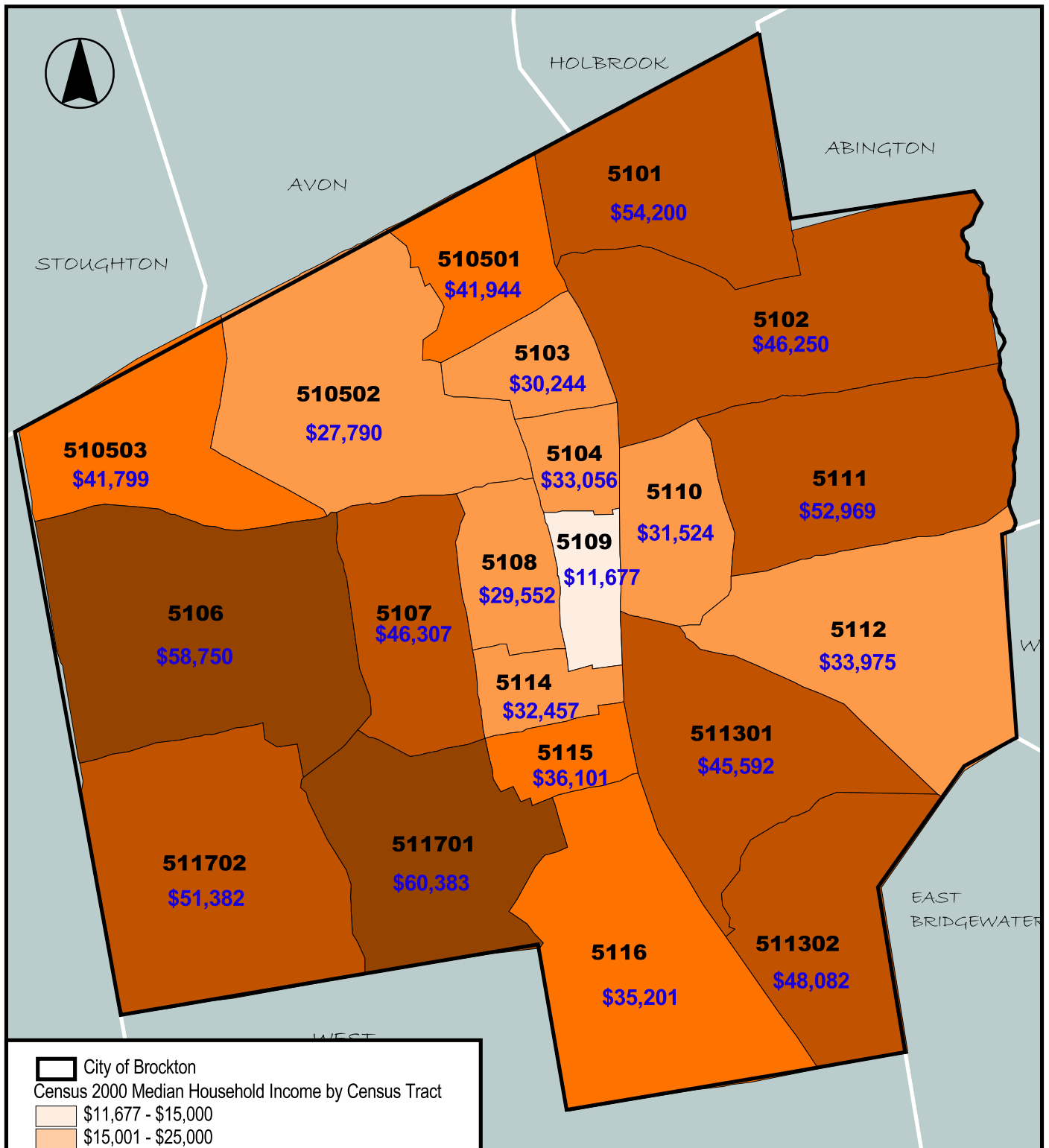
April, 2008

ATTACHMENT D

Map 2: Showing Median Household Income by Census 2000 Tracts

City of Brockton Census Tracts

by Median Household Income



City of Brockton

Census 2000 Median Household Income by Census Tract



\$11,677 - \$15,000



\$15,001 - \$25,000



\$25,001 - \$35,000



\$35,001 - \$45,000



\$45,001 - \$55,000



\$55,001 - \$60,383

Surrounding Communities

Census Tract

5106

Median Household Income

\$58,750



Old Colony Planning Council
70 School Street
Brockton, MA 02301

GIS Data Sources:
MassGIS, US Census2000

April, 2008